Appendix Exhibit 32

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Page 1
1
                 IN THE UNITED STATES DISTRICT COURT
               FOR THE WESTERN DISTRICT OF PENNSYLVANIA
2
     ABBY B. CONLEY,
 3
               Plaintiff
 4
                                       Civil Action No. 05-76E
          v.
 5
     COUNTY OF ERIE, ERIE COUNTY
     OFFICE OF CHILDREN AND YOUTH,
 6
     a/k/a ERIE COUNTY CHILD
     WELFARE SERVICE, RICHARD
 7
     SCHENKER, individually and
 8
     in his capacity as County
     Executive of Erie County,
     Pennsylvania, PETER CALLAN,
 9
     individually and in his
     capacity as Erie County
10
     Director of Personnel, DEBRA
     LIEBEL, individually and in
11
     her capacity as Executive
     Director, Erie County Office
12
     of Children and Youth, a/k/a
13
     Erie County Child Welfare
     Service, and JOHN A. ONORATO,
     ESQUIRE, individually and in
14
     his capacity as Erie County
15
     Solicitor,
               Defendants
16
17
               Deposition of [V.W.], taken before and by
18
19
          Janis L. Ferguson, Notary Public in and for the
20
          Commonwealth of Pennsylvania, on Thursday, April
21
          6, 2006, commencing at 9:49 a.m., at the offices
22
          of Knox McLaughlin Gornall & Sennett, PC, 120 West
          10th Street, Erie, Pennsylvania 16501.
23
24
                  Reported by Janis L. Ferguson, RPR
                 Ferguson & Holdnack Reporting, Inc.
25
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	Page 2		Page 4
1 For the Plaintiff:	, age 2	1	[V.W.], first having been duly
Timothy D. McNa	r, Esquire	2	sworn, testified as follows:
2 821 State Street		_	Stronly casalica as rollons
Erie, PA 16501		3	
Anthony Angelon		4	DIRECT EXAMINATION
4 Vendetti & Vende 3820 Liberty Stre		5	BY MR. JOYAL:
5 Erie, PA 16509	a.	6	
	e, Erie County Office of Children and	7	Q. State your name for the record, please.
7 Richard A. Lanzill	Inty Child Welfare Service:	8	A. [V.W.]
	Gornall & Sennett, PC	9	Q. Where do you live?
8 120 West 10th St	reet	10	A. 1706 West 8th Street.
Erie, PA 16501		11	Q. How old are you?
For the Defendants F	lichard Schenker, Peter Callan, and Debra		•
10 Liebel:	Ir Ecquiro	12	A. 24.
Edmund R. Joyal, 11 Law Office of Jos		13	Q. When were you born?
975 Two Chathar	n Center	14	A. 9/14/81.
<ul><li>12 Pittsburgh, PA 15</li><li>13 For the Defendant Jo</li></ul>		15	Q. You're here today pursuant to a subpoena; is that
Sara E. Baugh, E	squire	16	correct?
14 Dell Moser Lane		17	A. Yes.
525 William Penr 15 Suite 3700	riace	18	Q. That was issued by Mr. Lanzillo?
Pittsburgh, PA 15	5219	19	A. (Witness nods head.)
16 17		20	Q. Do you know that?
18			
19		21	A. No, I didn't know that.
20 21		22	Q. This (indicating) is Mr. Lanzillo. He represents
22		23	now the County of Erie. My name is Ed Joyal. I represent
23 2 <del>4</del>		24	Pete Callan, Debi Liebel, Rick Schenker. Who else?
25		25	MR. JOYAL: That's it, right?
		ļ	
	Page 3		Page 5
1	INDEX	1	Q. I can't think of my clients in this lawsuit.
2		2	You're not party to the lawsuit between Abby
3 TESTIMONY O	F [V.W.]	3	Conley and OCY, are you?
4 Direct exar	nination by Mr. Joyal 4	4	A. Party?
5 Cross-exan	nination by Mr. Lanzillo 59	5	Q. A party. Yeah, you're not a Plaintiff in this
	nination by Mr. McNair 82		
0 0.000 0.000		6	case.
7 Redirect av	-	6 7	case. A. No.
	amination by Mr. Joyal 92	7	A. No.
8 Recross-ex	amination by Mr. Joyal 92 amination by Mr. Lanzillo	7 8	A. No. Q. No, okay. And you're being represented today by
<ul><li>8 Recross-ex</li><li>9 Recross-ex</li></ul>	amination by Mr. Joyal 92 amination by Mr. Lanzillo 102 amination by Mr. McNair	7 8 9	A. No. Q. No, okay. And you're being represented today by counsel?
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	Page 6		Page 8
1	object to the extent that she believes that some of these	1	heart during the course of the time that you knew her?
2	things either involve privilege between the two of you,	2	A. Yeah.
3	maybe privilege with another attorney, or if there's some	3	Q. And she would talk to you about things and give
4	things that might impact on any future legal proceedings	4	you information about certain things?
5	that you might have that might have to do with placing you	5	A. We didn't talk much in the beginning.
6	at risk or self-incrimination. Other than that, she's not	6	Q. Okay. Well, what about in let's say, from late
7	going to be able to object or to tell you not to answer a	7	2003 into 2004.
8	question. That's going to be confined to the other lawyers	8	A. Yeah.
9	that have appearances in this case.	9	Q. Did she become more actively involved in your
10	Do you understand?	10	cases?
11	A. Yeah.	11	A. I don't know about more actively involved, but we
12	Q. Is there any reason why either through the taking	12	talked more.
13	of medication or something else that you believe you might	13	Q. You talked more?
14	not be able to conduct this deposition today?	14	A. Yes.
15	A. No.	15	Q. Would she call you on the telephone, talk to you?
16	Q. Are there any medications that you're on that may	16	A. No. We talked at my visits.
17	affect your memory?	17	Q. At your visits. Now, you have, I believe, three
18	A. Just Tylenol and Robitussin.	18	children?
19	Q. Now, I see that you're pregnant.	19	A. Yes.
20	A. Yes.	20	Q. Tell us their first names, if you would.
21	Q. If because of your pregnancy you need to leave to	21	A. [D.], [J.], and [M.].
22	do anything, please let us know. We'll be happy to	22	Q. And it's my understanding that two of the children
23	accommodate you. Okay?	23	are twins.
24	A. Okay.	24	A. No.
25	Q. Also, what we're going to do here is there are	25	Q. No? They are not. You have two by one father?
ļ		<u> </u>	
	Page 7		Page 9
1	going to be questions asked. Your name is not going to		
	going to be questions asked. Total flame is not going to	1	A. Yes.
2	appear in the transcript. It's just going to be initials.	1 2	Q. Okay. And then one by another?
3	appear in the transcript. It's just going to be initials.  Any references to any of your children will also be	1	Q. Okay. And then one by another? A. Yes.
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<u> </u>			D 40
1	Page 10 Miss Scarpitti your lawyer as well?	1	Page 12 discussed with her lawyer
2	A. No.	2	MR. JOYAL: I didn't ask her
3	Q. You have another lawyer?	3	MS. SCARPITTI: and anything that was given to
4	A. Yes.	4	her by her lawyer
5	Q. I have some documents here that have been	5	MR. JOYAL: Let me ask it this way, then:
		6	Q. Did you have a copy of the summaries before the
6	previously marked in other depositions, and I'm going to show them to you and ask if you can identify them for me.	7	hearing?
7	· · · · · · · · · · · · · · · · · · ·	8	(Discussion held off the record.)
8	Okay? These are all documents. One purports to be a letter	9	Q. Would you have gotten them before the hearing?
9	written to someone named [R.], signed by someone named [V].	10	A. I believe I did.
10	It was marked as Conley Exhibit No. 13. Why don't you take	11	Q. You believe you got them before the hearing. Did
11	a look at that and tell me if you recognize the handwriting	12	you get any of them from Abby Conley directly?
12	in that letter.	13	A. Not directly from her.
13	A. Yes, that's my handwriting.	14	Q. And your recollection is, is that would it have
14	Q. Okay. And is that your signature at the back?	l	,
15	A. Yeah.	15	been, then, from your lawyer? Your lawyer had gave you the summaries before the hearing?
16	Q. And there's a date on that of 5/21.	16	~
17	A. (Witness nods head.)	17 18	A. Yeah.     Q. Before the hearing that you were talking about
18	Q. Do you know whether that was 2004? It references	l	
19	some hearings, I believe.	19	there, did you have any conversations with Abby Conley?
20	A. It was most likely 2004, then.	20	A. Probably.
21	Q. Would have been May 21st, 2004?	21	Q. Did she tell you about what she was what was contained in her summary?
22	A. Yeah.	22 23	A. No. Maybe after I got the summary. Maybe I
23	Q. And is that a summary to Mr. [B.] of a hearing		asked would have asked her about it.
24	that took place regarding your [D.] and the other child?	24 25	Q. Oh, okay. So your recollection may be that you
25	A. Yes.	25	Q. On, okay. 30 your reconection may be that you
1	Page 11		Page 13
1	Page 11	1	Page 13 would have gotten the summaries before the hearing, and then
1 2	Q. I mean, there are quotes in there from court	1	would have gotten the summaries before the hearing, and then
2	Q. I mean, there are quotes in there from court summaries and things such as that.	1 2 3	
2 3	Q. I mean, there are quotes in there from court summaries and things such as that.  A. Yeah.	2	would have gotten the summaries before the hearing, and then you would have spoken with Abby Conley about what was in the
2 3 4	<ul><li>Q. I mean, there are quotes in there from court</li><li>summaries and things such as that.</li><li>A. Yeah.</li><li>Q. And there's one of the summaries that's quoted</li></ul>	2	would have gotten the summaries before the hearing, and then you would have spoken with Abby Conley about what was in the summaries?  A. That's possible. I definitely got the summaries
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>Q. I mean, there are quotes in there from court summaries and things such as that.</li> <li>A. Yeah.</li> <li>Q. And there's one of the summaries that's quoted in there is Abby Conley's summary; is that right?</li> <li>A. (No response.)</li> <li>Q. I think it's within the first couple pages.</li> <li>A. Yeah.</li> <li>Q. And you wrote that letter just to give a report to</li> <li>[R.] about what had happened?</li> <li>A. Yes.</li> <li>Q. Do you know whether or not the hearing had already taken place when you wrote that letter, or is that before the hearing?</li> <li>A. I don't know for sure, but it must have been.</li> <li>It's more than likely it was afterwards.</li> <li>Q. Okay. How did you get copies of the summaries? MS. SCARPITTI: Objection. I think that's going to go to attorney/client privilege. MR. JOYAL: Why? Were you her lawyer at that time? MS. SCARPITTI: No, but she was represented by</li></ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	would have gotten the summaries before the hearing, and then you would have spoken with Abby Conley about what was in the summaries?  A. That's possible. I definitely got the summaries before the hearing, though.  Q. Okay. But you're not sure whether or not they came from your lawyer or they came from through Abby. Is that right?  A. Oh, yeah, they came from my lawyer.  Q. Okay. But you are somewhat sure that before the date of the hearing, you and Abby Conley had a conversation about what was contained in the summaries.  A. Before the hearing?  Q. Before the hearing.  A. Not that I remember specifically. It was a long time ago.  Q. I understand. Okay. So I just want to make sure, because I thought you told me that you thought that you would have probably had a conversation with her about the summaries before the hearing.  A. It seems likely, but I'm not even sure that I seen her after I got the summaries and before my hearing.

	Page 14		Page 16
1	Q. Sometime in late 2003. Do you have any	1	himself?
2	recollection during that period of time, before May 21st of	2	MS. SCARPITTI: Objection. Goes to
3	2004, of Abby Conley discussing with you things that may	3	attorney/client privilege. Anything that Amy
4	have been contained in agency records concerning you, like	4	Jones would have told her.
5	summaries and like plans?	5	Q. Did Abby Conley tell you that?
6	A. No.	6	A. No.
7	Q. No? You don't have a recollection?	7	Q. Do you know how Amy Jones would have known about
8	A. (Witness shakes head.)	8	that?
9	Q. Okay. I'm going to show you another document.	9	MS. SCARPITTI: Again, objection. Goes to
10	This one was marked as Conley Exhibit No. 15. Tell me if	10	attorney/client privilege.
11	you recognize the handwriting on that.	11	Q. Do you know why Amy Jones would have even spoken
12	A. That's also my writing.	12	about a social worker's personal life to you?
13	Q. Okay. And is that directed to the same	13	MS. SCARPITTI: Objection. Goes to
14	individual?	14	attorney/client privilege.
15	A. Yes.	15	MR. JOYAL: Okay. I'm going to reserve our rights
16	Q. And your signature on the back page?	16	to you understand, Ms. Scarpitti, that this has
17	MR. McNAIR: Are you going to offer the document?	17	to do with whether or not confidential information
18	MR. JOYAL: I just did. It's Conley Exhibit No.	18	contained in an OCY case file was given to your
19	15.	19	client.
1		20	MS. SCARPITTI: Yes.
20	A. Yes.	21	MR. JOYAL: And what you're telling me now, I
21	Q. Okay. That's your handwriting and that's your	22	believe, is that you believe that that has no
22	signature?	23	value to this case in terms of whether or not Abby
23	A. Yes.	24	Conley may have given that information in
24	Q. And this was a letter you wrote to [R.B.]?	25	violation of OCY policy and/or Child Protective
25	A. Yes.	25	violation of OCT policy analysis clinia i rocceave
	Page 15		Page 17
1	Q. Okay. May I see that, please. Okay.	1	Services Law to Miss Jones.
2	(Discussion held off the record.)	2	MS. SCARPITTI: What I'm saying is that my client
3	Q. Miss [W.], I'm going to show you something that	3	stated that Abby did not give it to her. Whether
4	I've highlighted from the May 21st, 2004 letter, and I want	4	or not Abby did give it to Amy, the only way
5	you to read if you would, read it out loud into the	5	Ms. [W.] would know about that was if Amy said
6	record. This is something you wrote to Mr. [B.]; is that	6	that Abby gave it to her, in which case that would
7	right?	7	be attorney/client privilege. I would suggest
8	A. Yes.	8	that if you want to find out where her lawyer got
9	Q. Okay. Do you want to read that out loud?	9	it from, you would ask her attorney.
10	, ,	1	
1 **	A "IP I got a lot of perve to talk about my	1 117	MR. JOYAL: Well, if you were here vesterday.
111	A. "[P.] got a lot of nerve to talk about my	10	MR. JOYAL: Well, if you were here yesterday,
11	supervision. Where was her supervision when her 10-year-old	11	you'd would know the answer.
12	supervision. Where was her supervision when her 10-year-old hung himself?"	11 12	you'd would know the answer. BY MR. JOYAL:
12 13	supervision. Where was her supervision when her 10-year-old hung himself?"  Q. Where did you get the information in reference to	11 12 13	you'd would know the answer.  BY MR. JOYAL:  Q. So you did not get this information from Abby
12 13 14	supervision. Where was her supervision when her 10-year-old hung himself?"  Q. Where did you get the information in reference to [P.] about her 10-year-old hanging himself?	11 12 13 14	you'd would know the answer.  BY MR. JOYAL:  Q. So you did not get this information from Abby Conley.
12 13 14 15	supervision. Where was her supervision when her 10-year-old hung himself?"  Q. Where did you get the information in reference to [P.] about her 10-year-old hanging himself?  THE WITNESS: Can I ask	11 12 13 14 15	you'd would know the answer.  BY MR. JOYAL: Q. So you did not get this information from Abby Conley. A. No.
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	Page 18		Page 2
1	Q. You didn't get it from your mother?	1	the question, so she just waived the privilege.
2	A. No.	2	MR. ANGELONE: Object to relevance.
3	Q. Didn't get it from your father?	3	MR. JOYAL: Okay? She answered the question. Ar
4	A. No. But I also did get it from my the kids'	4	she's waived the privilege twice by saying that
5	paternal grandmother.	5	Amy told her.
6	Q. The kids' paternal grandmother gave it to you.	6	MS. SCARPITTI: No, she has not waived the
7	Where did she get the information?	7	privilege.
8	A. I'm not sure. But it was after Amy gave it to me.	8	MR. JOYAL: Oh, I I disagree, Miss Scarpitti.
9	Q. It was after Amy gave it to you.	9	MR. McNAIR: Then take it up with the Judge. Quit
10	A. Yes.	10	wasting our time with arguing and bickering with
11	Q. So why was that? Do you know? Do you have any	11	lawyers across the table. I've had it.
12	idea why Amy Jones would have been talking to you about your	12	Q. You had information given to you from Miss Jones
l3	social worker's personal life?	13	about the social worker's personal life; is that right?
14	MS. SCARPITTI: Objection. It goes to	14	A. Yes.
L5	attorney/client privilege.	15	(V.W. Deposition Exhibit 1
L6	MR. JOYAL: No. I asked her	16	marked for identification.)
17	MR. McNAIR: I object on grounds of relevancy.	17	(Discussion held off the record.)
18	MR. JOYAL: That's fine. I asked her if she	18	Q. Take a look at Exhibit No. 1. Is that your
19	knew which is what you suggested to me, Miss	19	handwriting?
20	Scarpitti is if she knew why or has any	20	A. Yes.
21	understanding as to why, independent of her	21	Q. What is the date of that letter?
22	conversation with her lawyer.	22	A. June 3rd, 2004.
23	Excuse me, Mr. McNair, you don't represent	23	Q. Again, written to [R.B.]
24	her, so I would suggest that you please not coach	24	A. Yes.
25	Miss Scarpitti in terms of what you want her to	25	Q. Your signature on the back of it, the last page?
1	Page 19 tell about her client.	١.,	Page
-		1	A. Yes.
2	MS. SCARPITTI: Well, first of all, what I	2	A. Yes.     Q. Okay. I've highlighted some portion of that
2 3	MS. SCARPITTI: Well, first of all, what I suggested was that she not that [V.] not be	l	
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	Se 1.03-64-00070-00101		
	Page 22	1	Page 24
1	MR. ANGELONE: In fact, I'm going to object to	1	messy, but I just wrote a three-page letter to my attorney
2	anything that's read from this letter as to	2	telling her what Abby," blank, "and Leslie had said."?
3	relevance.	3	A. Yeah.
4	MR. JOYAL: That's fine.	4	Q. Okay. So you gave information to your lawyer
5	Q. Go ahead. Do you know where you stopped? Why	5	about what Ms. Conley had told you.
6	don't you start over again. Start with the "anyway".	6	A. Yeah.
7	A. "Anyway, Abby said that [P.] and Sue had a meeting	7	MS. SCARPITTI: Objection.
8	about me and that she's mad because they are working against	8	MR. JOYAL: Too late.
9	me instead of for me, and they are gonna put up a fight	9	MR. McNAIR: You're so clever, Ed. I really
10	against me, and that [P.] will probably be at most of my	10	admire you.
11	visits from now on, so that sucks."	11	MR. JOYAL: Tim, I wish I could say the same.
12	Q. Okay. Keep going. "Sorry".	12	MR. McNAIR: You have you have a way to ask
13	A. "Sorry my writing is messy, but I just wrote a	13	questions that you know are objectionable and try
14	three-page letter to my attorney telling her"	14	to get the witness to answer
15	MS. SCARPITTI: Objection. Attorney/client	15	MR. JOYAL: Tim
16	privilege.	16	MR. McNAIR: before the attorney has a chance
17	MR. JOYAL: Sorry, no. It's not it talks about	17	to object.
18	what she did, not what she said.	18	MR. JOYAL: Tim
19	Q. Go ahead.	19	MR. McNAIR: I admire that. It's very clever.
20	A. " telling her what Abby" I don't know what	20	MR. JOYAL: I think that what we need to
21	that says.	21	understand is that she doesn't represent you or
22	Q. Does that say — is there another name?	22	anyone on your team, and that you've been telling
23	A. Looks like it.	23	her what you don't want her client to answer in
24	Q. "And Leslie said." And what else does it say?	24	order to avoid what was there. We know they are
25	A. "And I told her I wanted to buy a copy of the	25	in the letters, we know that they have been
<b>-</b>	Page 22		Page 25
1	Page 23 court transcript."	1	authenticated as of right now. Okay?
2	Q. Okay. Either on June 3rd of 2004 or before	2	MS. SCARPITTI: I would object to the
3	June 3rd of 2004, Abby Conley had told you the things that	3	characterization that either Attorney McNair or
4	you wrote to [R.B.]?	4	Attorney Angelone has been telling me what to do
5	A. Yeah.	5	here.
6	Q. She told you about meetings that were being held,	6	MR. JOYAL: Okay.
7	she told you about what the strategy was, she told you about	7	MS. SCARPITTI: I'm here to protect [V.] and her
8	[P.W.] was going to be at most of your visits?	8	attorney/client privilege
9	MR. McNAIR: Objection. Lack of foundation.	9	MR. JOYAL: Okay, that's fine.
l	That's a complete misstatement.	10	MS. SCARPITTI: which you seem bent on
10	·	11	· · · · · · · · · · · · · · · · · · ·
11	Q. Let me see I'll quote it, then, just so Mr.	ŧ	destroying at this.
12	McNair is happy. You wrote, "Anyway, Abby said that [P.]	12	MR. JOYAL: Miss Scarpitti, what we are bent on
13	and Sue had a meeting about me and she was mad because they	13	doing here is getting information that has
14	are working against me instead of for me." Is that what	14	independent legal significance to this case.
15	Abby Conley told you?	15	MR. ANGELONE: Which is irrelevant to the case.
16	A. Yes.	16	MR. JOYAL: It is, Mr
17	Q. That she was mad about what they were doing.	17	MR. ANGELONE: Yeah.
18	Correct?	18	MR. JOYAL: Well, you can argue that at the time
19	A. Right.	19	of trial, Mr. Angelone.
20	Q. Okay. And that did she also tell you, "And	20	MR. ANGELONE: Love to. And I'd love to before
21	they are gonna put up a fight against me and that [P.] will	21	that.
22	probably be at most of my visits from now on, so that	22	_
23	sucks."?	23	MR. JOYAL: You can argue it whenever you want.
24	A. Yes.	24	·
25	Q. Then you also wrote to [R.], "Sorry my writing is	25	that your client was asked to leave the agency was
ı		1	

1			
	Page 26		Page 28
1	for violating confidentiality.	1	reason".
2	MR. ANGELONE: Not from any of these letters. I'm	2	A. "The reason Deanna called me is to warn me that
3	going to put that objection in the record.	3	they are going to detain [M.] and they are trying to put her
4	MR. JOYAL: Really? Not from these letters?	4	in a foster home rather than with your mom. She actually
5	Well, she's just testified	5	suggested I leave town and have the baby."
6	MR. McNAIR: There has been no foundation that the	6	Q. "But if"
7	agency knew anything about these	7	A. "But if I miss a visit with my kids, [P.] will use
8	(Proceedings interrupted by the reporter.)	8	that as abandonment, so I wouldn't even know where to go or
9	MR. McNAIR: There is no evidence that the agency	9	how to time it."
10	knew anything about these letters before Miss	10	Q. Let's stop right there. Okay? Deanna Cosby
11	Conley was terminated.	11	called you on the telephone?
12	MR. JOYAL: That's right, but they knew about them	12	A. Yes.
13	afterwards. But what we now know is that your	13	Q. To tell you all this stuff?
14	client gave	14	A. Yes.
15	MR. ANGELONE: And that's the basis for the	15	Q. Before Deanna called you, did you know about the
16	relevancy objection.	16	order?
17	MR. JOYAL: gave evidence and information	17	A. I never knew there was an order until I had the
18	orally to this witness.	18	baby.
19	MR. McNAIR: And that's the way that's the way	19	Q. But did you know that there was going to be an
20	it works.	20	attempt to take the baby before Deanna called you?
21	MR. JOYAL: Which means she should have been	21	A. I never really knew.
22	fired.	22	Q. Okay. Did Deanna tell you who asked her to call
23	MR. McNAIR: No.	23	you?
24	MR. JOYAL: Okay.	24	A. Who asked her to call me?
25	MR. McNAIR: You think?	25	Q. Yeah.
	Page 27	-	Page 20
1	Page 27 MR. JOYAL: I absolutely think, Mr. McNair.	1	Page 29 A. I did.
2	MR. McNAIR: Well, okay.	2	Q. Who did you tell well, did you have Deanna's
3	MR. JOYAL: Let's go on a little bit further.	3	phone number?
4	Let's mark this one as No. 2.	4	, A. W.:.
5			A. Yes.
-	IV.VV. DEDUSITION EXHIBIT Z	5	
6	(V.W. Deposition Exhibit 2 marked for identification.)	5 6	Q. Where did you get it from?
6 7 BY	marked for identification.)  MR. JOYAL:	i i	<ul><li>Q. Where did you get it from?</li><li>A. She was my caseworker. When she moved to North</li></ul>
7 BY	marked for identification.)  MR. JOYAL:	i i	<ul><li>Q. Where did you get it from?</li><li>A. She was my caseworker. When she moved to North Carolina, she still had the same cell phone number.</li></ul>
1	marked for identification.)	6	<ul><li>Q. Where did you get it from?</li><li>A. She was my caseworker. When she moved to North</li></ul>
7 BY 8 9	marked for identification.)  MR. JOYAL: Q. [V.W.] No. 2, is that your handwriting? A. Yes.	6 7 8	<ul><li>Q. Where did you get it from?</li><li>A. She was my caseworker. When she moved to North Carolina, she still had the same cell phone number.</li><li>Q. She told it to you. Did she tell you that she got</li></ul>
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1			
1	Page 30 Q. Well, it could have come the 4th of June?	1	Page 32 answer.
2	A. Yeah.	2	MR. JOYAL: She did, I believe.
3	Q. And is it true that Deanna Cosby suggested to you	3	MR. McNAIR: No, she didn't.
4	that you leave the jurisdiction to have the child?	4	Q. Okay. Had you finished your answer before I
5	A. She said if I were her, or something to the matter	5	cut
6	of that's the only way that I'm going to avoid it.	6	A. Somewhat. I was just going to say that the
7	Q. So she was advising you to leave. In effect.	7	detention order was signed anyway, before she even asked me
8	A. Well, she also said that she knew I couldn't	8	to do those things.
9	because of my other kids	9	Q. Do you have a recollection at any time of Abby
10	Q. Other kids.	10	Conley telling you that [P.W.] had assaulted one of your
11	A that I'm fighting for. So she wasn't advising	11	children?
12	me. She was more or less using a way with words.	12	A. Of Abby Conley telling me that
13	Q. Well, let me explore that with you. Did she say,	13	Q. [P.W.] had
14	if I were you, I would leave, because that's the only way	14	A assaulted one of my children.
15	you're going to avoid, you know, losing your child?	15	Q assaulted one of your children or been rough
16	A. I don't remember what her exact words were, but my	16	with one of your children?
17	impression was that she wasn't being too serious about it,	17	A. I remember talking about it.
18	because she knew that I wanted my other kids.	18	Q. With Abby?
19	Q. All right. But she did mention I mean, you say	19	A. Yeah.
20	here, "She actually suggested I leave town and have the	20	<ul><li>Q. When did she tell you that?</li><li>A. I have no idea.</li></ul>
21	baby." A. Yeah.	21	Q. Did she tell you that she had filed a report
23	Q. That doesn't you know, why would you have told	23	against [P.W.] of child abuse?
24	that to Mr. [B.] if you didn't believe that she was being	24	MR. McNAIR: Objection. Foundation.
25	somewhat serious?	25	Q. You can answer.
			-
	Page 31		Page 33
1	-3		
1	<ol> <li>It may have just been the way I worded it to him.</li> </ol>	1	A. No, I don't believe so.
2	A. It may have just been the way I worded it to him. I didn't put much thought in these letters, because I never	1 2	
	I didn't put much thought in these letters, because I never thought I would have to come back to them.		A. No, I don't believe so.
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	Page 34		Page 36
1	A. "Hey, I came up with a good idea. You know what	1	have taken your idea or your fantasy forward, that you could
2	I'd love to do? Steal [P.]'s case aide Abby from her and	2	have paid Abby Conley \$500 a week?
3	have her be my babysitter. If I had all three kids, I could	3	A. Yes.
l	·	4	
4	pay her about \$500 a week. That's probably more than she	l	Q. And still been able to live and do what you needed
5	makes and maybe more than [P.] makes. I would love for her	5	to do.
6	to make more than Patty. She's real good with kids too. My	6	A. Yes.
7	kids like her."	7	Q. Were you paying Amy Jones?
8	Q. Okay. What were you doing for a living at that	8	A. Yes.
9	time?	9	Q. Had you given her a retainer?
10	A. I believe I was working at the Jockey and at	10	MS. SCARPITTI: Objection. Attorney/client
11	Valerio's.	11	privilege. It's also irrelevant.
12	Q. And what was your salary?	12	MR. JOYAL: To what? You're not a party.
13	A. About a thousand dollars a week at the Jockey and	13	MR. McNAIR: She's objecting on privilege
14	hardly anything at Valerio's.	14	MR. JOYAL: You can't object to relevance,
15	MR. McNAIR: And what?	15	Miss Scarpitti.
16	MR. JOYAL: Hardly anything.	16	MR. ANGELONE: I am objecting to relevance.
17	A. Maybe like a hundred a week there.	17	MR. JOYAL: You can object.
18	Q. What's Valerio's?	18	MR. McNAIR: Thank you for letting us object, Ed.
19	A. It's an Italian restaurant.	19	That's so kind of you.
20	Q. Were you a waitress?	20	BY MR. JOYAL:
1	A. Yes.	21	Q. So you were paying Miss Jones. She wasn't doing
21			
22	Q. I'm not familiar with the Jockey.	22	your case for free, right?
23	A. It's a health club.	23	A. Correct.
24	Q. Health club. So you were making a thousand	24	(V.W. Deposition Exhibit 4
25	dollars a week at a health club, a hundred dollars a week as	25	marked for identification.)
	Page 35		Page 37
1	a waitress. What were your expenses?	1	Q. Okay, Ms. [W.], would you take a look at Exhibit
2	A. I had to pay 250 for rent.	2	No. 4 and tell me if that's your handwriting.
3	Q. That's a month, right?	3	A. Yes.
4	A. Yes.	4	Q. Is that your signature on the back?
5	Q. Okay.	5	A. Yes.
1	•	6	Q. Okay.
6	A. And probably a hundred dollars a month for car		
7	insurance.	7	(Discussion held off the record.)
8	Q. So that's 350 a month. And then food for	8	Q. All right.
9	yourself?	9	MR. JOYAL: I'll give Mr. McNair an opportunity to
10	A. I'm not sure. I may have got food stamps.	10	look at the document.
11	Q. You may have gotten food stamps? So you were	11	Q. I'm going to ask you to turn to the last page of
12	A. I don't know.	12	the letter where I've highlighted.
13	Q. Did you work full I mean, I don't want to	13	A. (Witness complies.)
14	say I don't know about the Jockey. Was this like a	14	Q. Would you read for me start at the second
15	full-time job for you?	15	sentence. It says "I", all the way down to where I finished
16	A. Um-hum.	16	highlighting.
17	Q. So you were making approximately, if you worked	17	A. "I really like Abby. She's nice. She said she
18	all year, and let's say you took a couple weeks vacation,	18	was happy I saw [P.] grab [D.] too."
19	you were making about 50,000 a year?	19	Q. Can I stop you there. Does that say happy or
20	A. Yeah.	20	hoping?
21	Q. And you were on food stamps?	21	A. Maybe hoping.
22	A. I was for a while.	22	Q. Okay. "Hoping I saw [P.] grab [D.] too."?
ĺ		23	A. "Too."
23	Q. While you were working there?	1	
1 /4	A. I don't remember exactly.	24	Q. Okay, continue.
1	·	25	A "Co cho wacn't the only witness. I teld has I'm
25	Q. So you had you believe that you, if you could	25	A. "So she wasn't the only witness. I told her I'm

Page 38 Page 40 name would have been confidential. Okay? 1 lucky I didn't --" 1 Q. Does that say "see that shit"? 2 A. Yeah. 2 3 Q. So knowing that, does that help refresh your 3 A. Yeah, "see that shit, or I'd be incarcerated for assault. I'm really glad Abby filed the complaint." 4 recollection as to whether Ms. Conley told you that she, 5 indeed, had filed a complaint? Q. Now, I didn't highlight the next part, but does the next part say, "After this is all over with, I'm going 6 MR. ANGELONE: Objection. Relevance. 7 to get something nice for Abby, Deanna, and Lisa."? MR. McNAIR: He's not going to stop until he 8 browbeats her into saying what he wants. 8 A. Yes. Q. So before June 22nd of 2004 -- or on June 22nd, 9 9 Q. Would that refresh your recollection, based upon 10 2004, Abby Conley told you she had filed a complaint against 10 what I just told you, that the letter would not have identified the reporter; that Abby Conley, indeed, had told 11 [P.W.] for grabbing [D.]; is that right? 11 12 A. I'm not sure. I don't remember. 12 you that she had filed the complaint? 13 MR. McNAIR: Objection. Asked and answered. 13 Q. Well, how did you know that Abby Conley had filed 14 14 a complaint, if she didn't tell you? Q. You can answer it, ma'am. 15 A. I don't remember specifically, but I guess that's 15 A. I'm not sure. I don't remember how I knew it was her. But I knew there was a complaint, because I got a 16 what it says. 16 Q. Okay. It says that you were glad that Abby filed letter in the mail. 17 17 18 Q. Do you know what the date of the complaint was and 18 the complaint. the date of the letter? 19 A. Yeah. 19 20 (V.W. Deposition Exhibit 5 20 A. No, I don't. Q. Well, I will represent to you that DPW says -- or 21 marked for identification.) 21 22 Q. Okay, Ms. [W.], take a look, if you would, at the that the complaint was filed on the 21st of June. Okay? 22 23 next exhibit and tell me if that is a letter that you wrote. 23 Did you get a letter on the 22nd? 24 A. (Witness complies.) 24 A. I don't remember when I got the letter. 25 25 Q. But -- you don't remember. But as you sit here MR. McNAIR: Is this marked? Page 41 Page 39 today, could it have been that Abby Conley told you that? 1 MR. JOYAL: It's been marked as Exhibit No. 5. 2 MR. McNAIR: Objection. Calls for speculation. 2 MR. McNAIR: Thank you. 3 3 O. Well, let me ask it this way: Your letter to [R.] MR. JOYAL: You're welcome. 4 A. Yes. says, "She said she was hoping I saw [P.] grab [D.] so that 5 Q. Okay. And you signed it? she would not be the only witness." 5 6 6 A. (Witness nods head.) A. Yes. Q. Am I correct in presuming that the "she" that 7 Q. And this was written on July 15th of 2004; is that you're referring to is Abby? 8 correct? 8 9 9 A. Yes. A. Yes. Q. So she had a conversation with you sometime before 10 Q. When was [M.] born? 10 11 A. July 6th. 11 you wrote this letter on June 22nd saying to you that she 12 Q. So this was about nine days after her birth? wished you had seen it too so she wouldn't be the only 13 A. Yes. 13 witness. Right? 14 Q. All right. I want you to -- I highlighted, again, 14 A. Yeah, I guess. 15 some portions of that letter, and I'm going to ask you to 15 Q. And then you said, "I'm really glad Abby filed the 16 complaint," but as you sit here today, you're not sure read them for me, and I'm going to ask you some questions 16 17 whether she told you she filed the complaint or whether you 17 about them. 18 The first one starts with -- toward the end of the 18 heard that from DPW. You're not sure, right? first paragraph in the middle, it says "Abby said". 19 19 A. No, I'm not positive, no. 20 A. "Abby said I have a nice-sized Army. She called 20 Q. Okay. And has anyone told you that under Child me yesterday." 21 Protective Services Law, the identity of a reporter is 21 22 Q. What was the conversation that you and Abby Conley 22 confidential? 23 A. No. 23 had? With the exception of the quote "nice-sized Army", what were you talking about? 24 Q. No. Well, under law, the letter from DPW would 24 25 A. Sounds like the court battle. 25 not have said Abby Conley filed a complaint, because her

## Page 42 Page 44 Q. Did they identify anything that was contained in 1 1 Q. The court battle. Was she again giving you information and advice as to what you needed to do? 2 your case files that you had seen, that you may have given 2 3 3 A. I don't think so. Q. Okay. Let's go to the end of the page. And what 4 A. I don't think so. 5 Q. Okay. Go to the next thing that I have got I'm going to ask you to do is read that. And it carries 6 highlighted. I think it says "I'm glad". over to the next page. What does that say? A. "I'm just nervous about it, but they couldn't even 7 A. "I'm glad these people are really helping me. 7 get aggravated circumstances on Chris. I can't wait to talk 8 They certainly don't have to do it, but they are. Abby, 8 to Ed Palattella either." 9 Deanna, and Lisa especially. Especially Abby, who she's q Q. Let me ask you about that. Was Chris the father 10 putting her job on the line. After all this is over, I'll 10 of the other two children? 11 have to do something nice for the three of them." 11 12 A. Yes. 12 Q. Okay. So you were talking about three people; 13 Deanna Cosby, Abby Conley, and someone named Lisa. Q. Now, in the context of this, were you talking 13 about a termination hearing or something regarding those two 14 14 15 children? Q. Now, Lisa, I think, is a CASA worker; is that 15 A. They filed aggravated circumstances on Chris and 16 right? 16 A. No, she's a Project First worker. 17 17 lost. 18 Q. Which means -- well, in what context? Under 18 Q. And Abby Conley at that time was still employed by 19 OCY? what -- I mean, what type of proceedings was it? 19 20 A. I believe so, yes. 20 A. It was a court hearing. 21 Q. Was it for involuntary termination of rights or 21 Q. And you characterized Abby Conley and Deanna Cosby 22 as trying to help you. 22 just a dependency hearing? 23 A. Just a dependency hearing. 23 A. Yes. 24 Q. Now, what were you trying to -- what type of help 24 Q. And then you said, "I can't wait to talk to Ed were they giving you? Palattella about this." 25 Page 45 Page 43 A. Just -- I guess I just felt like as being 1 A. Yeah. 1 2 2 witnesses in my hearings, they would have had positive Q. What were you going to talk to him about? 3 A. I have talked to him about my whole case. 3 feedback, as opposed to everybody else that was being so 4 negative. 4 Q. Have you? 5 Q. And Abby had already been giving you information 5 A. Yes. 6 about what was contained in your case file and meetings that 6 Q. Giving him what type of information? 7 7 were being held within the agency, correct? A. Everything that happens. 8 MR. ANGELONE: Objection. I think that's a 8 Q. Even things that Abby Conley would have told you about your cases? 9 mischaracterization. 9 A. Possibly. 10 MR. JOYAL: I believe she testified earlier, based 10 11 O. Possibly. What were you hoping to accomplish by 11 on what --12 MR. McNAIR: I believe she hasn't testified to 12 that? 13 that at all. A. I was hoping to get public attention about how I 13 Q. Okay, let's go back to the letter. Okay? Let's 14 14 was -- how wrong I was done by the agency. 15 go back to the first letter which was 6/3. Did we mark that 15 Q. Oh, I see. Okay. And so would some of the one yet? Has that been marked or not? Or did we just read information that you were giving him about how the agency 16 into the record from 6/3? 17 was doing you wrong have come from Abby Conley? 17 18 MS. SCARPITTI: It's been marked as 1, I believe. A. I don't remember specifically what I gave him. 18 19 19 Q. Okay. MR. JOYAL: Okay. 20 Q. Exhibit No. 1, you read into the record, "Anyway, 20 A. So. 21 Abby said that [P.] and Sue had a meeting about me and that 21 Q. Were there ever any newspaper stories written by 22 she was mad because they are working against me instead of 22 Ed Palattella about your specific case? 23 for me and they are going to put up a fight against me and 23 24 Q. Did they ever mention Miss Conley's name in them? 24 that [P.] will probably be at most of my visits from now on, 25 so that sucks." Right? 25 A. I don't remember.

Cas	Document 10-1		1 lied 04/12/2000 1 age 14 01 70
	Page 46		Page 48
1	A. Yes.	1	Q. Did you get that information from Abby Conley?
2	Q. Abby Conley had been giving you information prior	2	A. No.
3	to writing this letter on June 3rd about meetings being held	3	Q. Did you get part of that information from Abby
4	at OCY, correct?	4	Conley?
5	A. Yeah.	5	A. The information about her son?
6	Q. And that was one of the types of help that Abby	6	Q. Yeah.
7	Conley was giving you, right?	7	A. No.
8	A. Yeah.	8	Q. Okay. Did you get the information did you give
9	(V.W. Deposition Exhibit 6	9	him the information about the investigation and the finality
10	marked for identification.)	10	of the investigation?
11	Q. Do you see that? Have you ever seen that letter	11	A. Yes.
12	before?	12	Q. Would I be correct that at no time had you ever
13	A. Yes.	13	been told by anyone from the Department of Public Welfare
l		14	that the alleged perpetrator was [P.W.]?
14		15	A. No.
15	A. Yes. It's [R.]'s.	16	Q. I'm not correct?
16	Q. It's [R.]'s.	17	-
17	A. Yes.		A. Yes, you are.
18	Q. I want to go and this is a letter dated	18	Q. I am correct. So that the only person that you
19	July 9th, 2004 to Sue Deveney; is that right?	19	got the information about as to who this perpetrator was,
20	A. Yes.	20	was Abby Conley. Is that right?
21	Q. Do you know who Sue Deveney is?	21	A. No. Actually, I had seen her do something to my
22	A. It is it was [P.W.]'s supervisor and Deanna	22	child also. And another witness had seen her do something
23	Cosby's supervisor.	23	to my child.
24	Q. Okay. Take a look, if you would, on the second	24	Q. When?
25	page.	25	A. Around that same time.
1			
	Prace 47		Page 40
1	Page 47	1	Page 49 O. What was it that you saw?
1 2	A. (Witness complies.)	1 2	Q. What was it that you saw?
2	<ul><li>A. (Witness complies.)</li><li>Q. There is the second full paragraph on the</li></ul>	2	<ul><li>Q. What was it that you saw?</li><li>A. I saw her grab my daughter by her arm and pick her</li></ul>
2	A. (Witness complies.)  Q. There is the second full paragraph on the second page starts, "I" Do you see this? "I was also".	2	<ul><li>Q. What was it that you saw?</li><li>A. I saw her grab my daughter by her arm and pick her up by her arm and shake her and yell at her.</li></ul>
2 3 4	A. (Witness complies.)  Q. There is the second full paragraph on the second page starts, "I" Do you see this? "I was also".  Do you see that?	2 3 4	<ul><li>Q. What was it that you saw?</li><li>A. I saw her grab my daughter by her arm and pick her up by her arm and shake her and yell at her.</li><li>Q. Okay. And did you file a complaint?</li></ul>
2 3 4 5	<ul> <li>A. (Witness complies.)</li> <li>Q. There is the second full paragraph on the second page starts, "I" Do you see this? "I was also".</li> <li>Do you see that?</li> <li>A. Yes.</li> </ul>	2 3 4 5	<ul><li>Q. What was it that you saw?</li><li>A. I saw her grab my daughter by her arm and pick her up by her arm and shake her and yell at her.</li><li>Q. Okay. And did you file a complaint?</li><li>A. Yes.</li></ul>
2 3 4 5 6	<ul> <li>A. (Witness complies.)</li> <li>Q. There is the second full paragraph on the second page starts, "I" Do you see this? "I was also".</li> <li>Do you see that?</li> <li>A. Yes.</li> <li>Q. Would you read it out loud, if you would.</li> </ul>	2 3 4 5 6	<ul><li>Q. What was it that you saw?</li><li>A. I saw her grab my daughter by her arm and pick her up by her arm and shake her and yell at her.</li><li>Q. Okay. And did you file a complaint?</li><li>A. Yes.</li><li>Q. Of child abuse? Who did you file it with?</li></ul>
2 3 4 5 6 7	<ul> <li>A. (Witness complies.)</li> <li>Q. There is the second full paragraph on the second page starts, "I" Do you see this? "I was also".</li> <li>Do you see that?</li> <li>A. Yes.</li> <li>Q. Would you read it out loud, if you would.</li> <li>A. "I was also informed that [P.] was investigated</li> </ul>	2 3 4 5 6 7	<ul> <li>Q. What was it that you saw?</li> <li>A. I saw her grab my daughter by her arm and pick her up by her arm and shake her and yell at her.</li> <li>Q. Okay. And did you file a complaint?</li> <li>A. Yes.</li> <li>Q. Of child abuse? Who did you file it with?</li> <li>A. I tried to file it with Sue Deveney. She ignored</li> </ul>
2 3 4 5 6 7 8	<ul> <li>A. (Witness complies.)</li> <li>Q. There is the second full paragraph on the second page starts, "I" Do you see this? "I was also".</li> <li>Do you see that?</li> <li>A. Yes.</li> <li>Q. Would you read it out loud, if you would.</li> <li>A. "I was also informed that [P.] was investigated for grabbing, shaking, and yelling at [D.], though your</li> </ul>	2 3 4 5 6 7 8	<ul> <li>Q. What was it that you saw?</li> <li>A. I saw her grab my daughter by her arm and pick her up by her arm and shake her and yell at her.</li> <li>Q. Okay. And did you file a complaint?</li> <li>A. Yes.</li> <li>Q. Of child abuse? Who did you file it with?</li> <li>A. I tried to file it with Sue Deveney. She ignored me.</li> </ul>
2 3 4 5 6 7 8 9	A. (Witness complies.) Q. There is the second full paragraph on the second page starts, "I" Do you see this? "I was also". Do you see that? A. Yes. Q. Would you read it out loud, if you would. A. "I was also informed that [P.] was investigated for grabbing, shaking, and yelling at [D.], though your agency stated these allegations could not be proven, given	2 3 4 5 6 7 8 9	<ul> <li>Q. What was it that you saw?</li> <li>A. I saw her grab my daughter by her arm and pick her up by her arm and shake her and yell at her.</li> <li>Q. Okay. And did you file a complaint?</li> <li>A. Yes.</li> <li>Q. Of child abuse? Who did you file it with?</li> <li>A. I tried to file it with Sue Deveney. She ignored me.</li> <li>Q. Did you call the Child Abuse Hotline and file a</li> </ul>
2 3 4 5 6 7 8 9 10	<ul> <li>A. (Witness complies.)</li> <li>Q. There is the second full paragraph on the second page starts, "I" Do you see this? "I was also".</li> <li>Do you see that?</li> <li>A. Yes.</li> <li>Q. Would you read it out loud, if you would.</li> <li>A. "I was also informed that [P.] was investigated for grabbing, shaking, and yelling at [D.], though your agency stated these allegations could not be proven, given her personal history and other incidents I have been made</li> </ul>	2 3 4 5 6 7 8 9	<ul> <li>Q. What was it that you saw?</li> <li>A. I saw her grab my daughter by her arm and pick her up by her arm and shake her and yell at her.</li> <li>Q. Okay. And did you file a complaint?</li> <li>A. Yes.</li> <li>Q. Of child abuse? Who did you file it with?</li> <li>A. I tried to file it with Sue Deveney. She ignored me.</li> <li>Q. Did you call the Child Abuse Hotline and file a complaint?</li> </ul>
2 3 4 5 6 7 8 9 10 11	A. (Witness complies.) Q. There is the second full paragraph on the second page starts, "I" Do you see this? "I was also". Do you see that? A. Yes. Q. Would you read it out loud, if you would. A. "I was also informed that [P.] was investigated for grabbing, shaking, and yelling at [D.], though your agency stated these allegations could not be proven, given her personal history and other incidents I have been made aware of. I trust you and your agency will do all that you	2 3 4 5 6 7 8 9 10	<ul> <li>Q. What was it that you saw?</li> <li>A. I saw her grab my daughter by her arm and pick her up by her arm and shake her and yell at her.</li> <li>Q. Okay. And did you file a complaint?</li> <li>A. Yes.</li> <li>Q. Of child abuse? Who did you file it with?</li> <li>A. I tried to file it with Sue Deveney. She ignored me.</li> <li>Q. Did you call the Child Abuse Hotline and file a complaint?</li> <li>A. I think so, yes.</li> </ul>
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	Page 50		Page 52
1	born.	1	Q. Well, let's just try to go through this. Okay?
2	Q. Where was it? Where did it happen?	2	The baby was born on the 6th, right?
3	A. At Loveli Place.	3	A. Yes.
4	Q. Where was [P.]?	4	Q. The baby had been the subject of a detention order
5	A. She was there.	5	signed by a Judge?
6	Q. Was Abby there?	6	A. Yes.
7	A. No.	7	Q. When was the baby released from the hospital?
8	Q. Who else was there?	8	A. Probably the 7th or 8th.
9	A. I believe [C.], [M.]'s grandmother was there, and	9	Q. Okay. So if it was the 8th, when were you
10	also my two other kids.	10	released from the hospital?
11	MR. ANGELONE: I'm sorry; I didn't hear that.	11	A. I was released the next day, because I had to go
12	MR. JOYAL: [C.], [M.]'s grandmother, and her	12	to the detention hearing. I was released on the
13	other two kids.	13	Q. The 7th?
14	Q. Did you identify [C.B.] as a witness?	14	A. The 7th.
15	A. I'm not even positive she was there.	15	Q. And the baby was then released the next day on the
16	Q. Oh, okay.	16	8th to [C.B.]'s custody.
17	A. I'm just assuming she was.	17	A. To [J.H.]'s custody.
18	Q. What about the Project First Step person? Was she	18	Q. Oh, a foster parent?
19	there?	19	A. [C.]'s cousin.
20	A. I don't think so. Not that I remember.	20	Q. Was [J.H.] there when you were feeding [M.] on the
21	Q. So what you're telling me, then, I think, is that	21	8th?
22	if [C.B.] was not there, with the exception of the two other	22	A. I don't think so.
23	kids well, [M.] wouldn't have been there, would she? Or	23	Q. So if I understand what you just told me, she's
24	was she brought there?	24	born on the 6th, she's released from the hospital on the
25	A. [M.] was there.	25	8th. You're at Lovell Place for a visit with your other two
	Page 51		Page 53
1	Q. So [M.] was what? This was the 9th of July that	1	children. What time did your visits normally occur?
2	[R.] wrote this letter, and the baby was born on the 3rd?	2	A. I think around 1:00.
3	A. The baby was born on the 6th.	3	Q. Around 1:00. So do you know what time the baby
4	Q. 6th of July. So three days within three days	4	would have been released from the hospital?
5	or two days [M.] had been released from the hospital and was	I -	
6		5	A. No, I don't.
ı	attending a visit with you at Lovell Place, being brought	6	Q. So you don't even know whether the baby had been
7	attending a visit with you at Lovell Place, being brought there by her grandmother?	1	
l _	there by her grandmother?  A. No, probably not.	1	Q. So you don't even know whether the baby had been
7	there by her grandmother?	6 7	<ul><li>Q. So you don't even know whether the baby had been released at that point in time or not, right?</li><li>A. No, I don't remember.</li><li>Q. And if, indeed, you had been feeding [M.], then</li></ul>
7 8	there by her grandmother?  A. No, probably not.  Q. Highly unlikely, isn't it?  A. Yes.	6 7 8	<ul> <li>Q. So you don't even know whether the baby had been released at that point in time or not, right?</li> <li>A. No, I don't remember.</li> <li>Q. And if, indeed, you had been feeding [M.], then what would have happened was they would have released the</li> </ul>
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. No, probably not. Q. Highly unlikely, isn't it? A. Yes. MR. McNAIR: Objection. Argumentative. Q. But it's highly unlikely. MR. McNAIR: Objection. Argumentative. Q. That she would have been there. A. Yes. Q. So, therefore, the only other person, unless there was a Project First Step person there or Abby Conley, the only other person that would have been there was you. A. Well, it was because of [M.], the reason why she grabbed [D.] and yelled at her. Because I was feeding [M.], so. Q. Well, you just told me, though, that that was a	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. So you don't even know whether the baby had been released at that point in time or not, right?  A. No, I don't remember.  Q. And if, indeed, you had been feeding [M.], then what would have happened was they would have released the baby and brought her directly to Lovell Place so that you could feed her?  A. Yeah. It doesn't make sense.  Q. Doesn't make sense, does it?  A. I'm guessing maybe [R.] might have put the wrong date on here.  Q. No, [R.] didn't put a date on here. [R.] put a date on the letter.  A. That's what I mean.  Q. Right.  A. I don't know. It was because of [M.].  Q. And this says, "I was also informed that [P.] was
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	there by her grandmother?  A. No, probably not. Q. Highly unlikely, isn't it? A. Yes. MR. McNAIR: Objection. Argumentative. Q. But it's highly unlikely. MR. McNAIR: Objection. Argumentative. Q. That she would have been there. A. Yes. Q. So, therefore, the only other person, unless there was a Project First Step person there or Abby Conley, the only other person that would have been there was you. A. Well, it was because of [M.], the reason why she grabbed [D.] and yelled at her. Because I was feeding [M.], so.	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. So you don't even know whether the baby had been released at that point in time or not, right?  A. No, I don't remember.  Q. And if, indeed, you had been feeding [M.], then what would have happened was they would have released the baby and brought her directly to Lovell Place so that you could feed her?  A. Yeah. It doesn't make sense.  Q. Doesn't make sense, does it?  A. I'm guessing maybe [R.] might have put the wrong date on here.  Q. No, [R.] didn't put a date on here. [R.] put a date on the letter.  A. That's what I mean.  Q. Right.  A. I don't know. It was because of [M.].  Q. And this says, "I was also informed that [P.] was investigated for grabbing, shaking, and yelling at [D.]."
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. No, probably not. Q. Highly unlikely, isn't it? A. Yes. MR. McNAIR: Objection. Argumentative. Q. But it's highly unlikely. MR. McNAIR: Objection. Argumentative. Q. That she would have been there. A. Yes. Q. So, therefore, the only other person, unless there was a Project First Step person there or Abby Conley, the only other person that would have been there was you. A. Well, it was because of [M.], the reason why she grabbed [D.] and yelled at her. Because I was feeding [M.], so. Q. Well, you just told me, though, that that was a	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. So you don't even know whether the baby had been released at that point in time or not, right?  A. No, I don't remember.  Q. And if, indeed, you had been feeding [M.], then what would have happened was they would have released the baby and brought her directly to Lovell Place so that you could feed her?  A. Yeah. It doesn't make sense.  Q. Doesn't make sense, does it?  A. I'm guessing maybe [R.] might have put the wrong date on here.  Q. No, [R.] didn't put a date on here. [R.] put a date on the letter.  A. That's what I mean.  Q. Right.  A. I don't know. It was because of [M.].  Q. And this says, "I was also informed that [P.] was

1	Page 54 A. Yes.	1	Page 56 Q. You did not go to Mr. McNair seeking legal advice,
2	Q. Right?	2	did you?
3	A. Yeah.	3	A. No.
4	Q. Because there's nothing in here that says, and	4	Q. Did Mr. McNair ever tell you that you might not
5	yesterday or today or whatever, [V.] tells me that she also	5	have to answer these questions because they were privileged
6	witnessed this happening, does it?	6	between you and your lawyer?
7	A. No, I guess not.	7	A. No.
8	Q. So this is all about this is all about the	8	Q. No? Did you ever meet with Mr. Angelone?
9	information that you had been given by Abby Conley	9	A. No.
10	concerning [P.W.] that you gave to [R.].	10	Q. Do you have a recollection of having spoken with
11	MR. McNAIR: Objection. Foundation.	11	Abby Conley about her case before the meeting that you had
12	Q. Correct?	12	with her a couple weeks ago?
13	MR. McNAIR: Misleads the record, as usual.	13	A. No.
14	Q. Correct?	14	Q. No? After she left OCY, did you and she have any
15	A. Could you repeat the question.	15	conversation about her maybe trying to help you in getting
16	Q. [R.]'s information that he was giving to Sue	16	back your children?
17	Deveney was just the stuff that you had given him about the	17	A. I knew that she would be a she was going to be
18	complaint that had been filed by Abby Conley against [P.W.],	18	a witness for me.
19	right? Not anything about what you saw.	19	Q. Did she ever tell you that she didn't like [P.W.]
20	A. Right.	20	or Sue Deveney?
21	Q. Right? Since July 9th of 2004, have you had any	21	A. I got that impression. I don't think she ever
22	conversations with Abby Conley?	22	came out and said it.
23	A. Yes.	23	Q. How did you get that impression?
24	Q. When was the last time you spoke to Abby Conley	24	A. Because of I don't remember. I'm trying to
25	before today?	25	think of exact facts, but I can't remember.
	Page 55		Page 57
1	A. I have no idea.	1	Q. Did Deanna Cosby ever tell you that she didn't
2	Q. Was it a week ago? Two weeks ago? A month ago?	2	like any of these folks?
3	A. Maybe maybe two weeks.	3	A. No.
4	Q. Did you talk about did she call you	4	Q. When Deanna Cosby was the worker on your case, did
5	A. Yes.	5	she ever drop your children off and leave?
6	Q or did you call her?	6	A. Yes.
7	A. I believe she called me.	7	Q. So that you could have unsupervised visitation
8	Q. And did you talk about her case?	8	with them?
9	A. Not really. She gave me Mr. McNair's phone	9	A. Yes.
10	number.	10	Q. During that period of time, all your visitation
11	Q. And asked you to contact Mr. McNair?	11	with the children was supposed to be supervised; is that
12	A. Yes.	12	right?
13	Q. Did you contact Mr. McNair?	13	A. I didn't think it was.
14	A. Yes.	14	Q. Well, did you ever see the order?
15	Q. Did you speak to him about your deposition	15	Not saying my visits were to be supervised, no.
16	testimony?	16	Q. Were they with the foster family?
1	A. Yes.	17	A. Yes.
17	Q. What did you and he talk about?	18	Q. And she picked them up from the foster home and
18	A Un just solved me some of the similar acceptant	19	would bring them to you and drop them off and then leave?
18 19	A. He just asked me some of the similar questions	l	A Voc
18 19 20	that you asked me.	20	A. Yes.
18 19 20 21	that you asked me.  Q. And did you give him similar answers?	20 21	Q. During that period of time, were there ever any
18 19 20 21 22	that you asked me.  Q. And did you give him similar answers?  A. Yes.	20 21 22	Q. During that period of time, were there ever any visits that you had that Deanna Cosby attended while at the
18 19 20 21 22 23	that you asked me.  Q. And did you give him similar answers?  A. Yes.  Q. You and Mr. McNair were not you didn't retain	20 21 22 23	Q. During that period of time, were there ever any visits that you had that Deanna Cosby attended while at the foster home?
18 19 20 21 22	that you asked me.  Q. And did you give him similar answers?  A. Yes.	20 21 22	Q. During that period of time, were there ever any visits that you had that Deanna Cosby attended while at the

Page 60 Page 58 correct? 1 1 A. She -- when I had a visit -- a couple, two, I think maybe three at the OCY office, and she was on the 2 A. Yes. 2 3 Q. Other than Abby Conley, can you think of any other 3 other side of a one-way mirror. 4 Q. Watching. 4 person who would have identified who made the complaint regarding [P.W.]? 5 5 A. Or two-way mirror. Yes. 6 A. What do you mean, who would have identified? Q. Okay. And did you ever hear of the foster mother 6 7 calling OCY to say that Deanna Cosby was violating the plan Q. Can you think of any person who would have told 7 8 you, as of the date that you authored Exhibit 4, your by picking the children up and taking them to you? 8 letter, any other source of information whereby you would 9 9 A. Hum-um. 10 have come to know that it was, in fact, Abby Conley who had 10 Q. Did Deanna Cosby ever tell you that? 11 filed the complaint, other than Abby herself? A. No. Actually, I think that -- I think there was a 11 Court Order that said one per month is supposed to be 12 A. No. 12 13 Q. I mean, in your mind, there simply is no one other 13 supervised or something. than Abby Conley who could have provided you with that Q. And you were getting how many? 14 14 15 information, is there? 15 A. I was getting --16 MR. McNAIR: It's argumentative. 16 Q. Every weekend? 17 A. Not that I can remember, no. 17 One a week, I believe. Q. She would pick the kids up on a weekend? 18 Q. And as I understand your testimony -- and please 18 correct me if I'm wrong. But you do recall that Deanna 19 19 A. No, on a weekday. Cosby told you that your child was going to be detained upon 20 20 Q. On a weekday, and drop them off. 21 her birth. Is that correct? 21 A. Yes. 22 A. Yes. 22 (Discussion held off the record.) 23 Q. All right. And did Ms. Cosby tell you how she 23 MR. JOYAL: I don't have any other questions. 24 knew that? 24 Thanks, Miss [W.]. Mr. Lanzillo or Mr. McNair may 25 A. I guess she didn't know for sure, because the rest 25 have a few questions for you. Page 61 Page 59 1 of her information wasn't accurate. CROSS-EXAMINATION 1 BY MR. LANZILLO: 2 Q. Well --2 3 3 A. She told me the baby was going to be detained and put into a foster home. It was detained, but it wasn't put Q. I have a few follow-up. My name is Rich Lanzillo, 4 into a foster home. 5 and I represent the County of Erie. Q. Did she tell you that she wanted you to know that? 6 6 In response to Mr. Joyal's questions, he had shown you an exhibit which I believe he marked as Exhibit 4, which 7 A. That she wanted me to know that? is one of your letters. I believe it's also Conley Exhibit 8 O. Um-hum. 8 17. If you have that, that would be helpful, but if not, I 9 A. No. She just told me. So she must have wanted me 10 to know. 10 think I can summarize it. Q. Okay. And, again, did she call you, or did you 11 That's the letter where you recited that Abby 11 12 call her? Conley told you that she was hoping you saw [P.] grab [D.] 13 A. Deanna? so that she would not be the only witness. Do you see that 13 14 14 in the highlighted portion of the letter? Q. Yes. A. I think originally I called her, but she called me 15 15 A. Yes. 16 back. I talked to her a couple times. 16 Q. And you go on to say that you were glad that Abby 17 Q. And how did you get Deanna's number? 17 had filed a complaint. 18 A. She was my caseworker. So when she moved, she 18 A. Yes. kept her same cell phone number. 19 Q. All right. And you understood that to be a 19 Q. Is that how you contacted her, via her cell phone? complaint to the Department of Public Welfare through the 20 20 21 21 Child Line? 22 Q. And during your conversations with Deanna Cosby, 22 A. Yes. Q. Okay. And you now understand, I think, that the 23 did she talk about Abby Conley? 23 A. I don't remember any specific conversations about letter that you would have received from DPW would not have 24 24 25 Abby. identified the complainant as Abby Conley or anyone else,

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	Page 62		Page 64
1	Q. Did you have any understanding at the time	1	A. If she was still supervising my visits, then
2	concerning the extent to which Abby Conley and Ms. Cosby	2	probably twice a week.
3	were communicating? I mean, you were aware, were you not,	3	Q. Outside of the scheduled contacts, did you have
4	that they were communicating?	4	any other interaction with her?
5	A. Yes.	5	A. I don't know if it was during that time, but I
6	Q. Okay. And am I correct that you knew that based	6	talked to her on the phone a few times.
7	upon what Abby had been telling you and based upon what	7	Q. How often did you talk to Abby Conley on the
8	Ms. Cosby had been telling you?	8	phone?
9	A. Yeah, I believe so.	9	A. Maybe three times, four times.
10	Q. Okay. Now, Mr. Joyal asked you some questions	10	Q. And would she talk to you from her office at OCY,
11	regarding statements that Amy Jones had made to you,	11	from home, on her cell phone?
12	specifically regarding the death of [P.W.]'s son.	12	A. I don't know where she talked to me from.
13	A. (Witness nods head.)	13	Q. Did you have a contact number to reach her, like
14	Q. Do you recall that?	14	you had for Deanna Cosby?
15	A. What was the first part of your question?	15	A. I think so. I'm not sure.
16	Q. Sure. You recall Mr. Joyal he asked you some	16	Q. How often or on how many occasions did you have
17	questions.	17	conversations with Deanna Cosby after she left OCY?
18	A. Yeah.	18	A. Probably I would say maybe like twice as many
19	Q. And in response to your questions, you had	19	as with Abby. Maybe once or twice a week.
20	identified Amy Jones as the source of the information	20	Q. And when did those start?
21	recited in one of your letters regarding the death of	21 22	A. I don't know. I think I talked to her the whole time, ever since she left my case, because my new caseworker
22	[P.W.]'s son. A. Yes.	23	I got wasn't servicing me, so I had no caseworker, you might
23	Q. Do you recall that?	24	as well say, so I just kept talking to her, even though she
25	A. (Witness nods head.)	25	was out of town.
23	A. (William House Headly	-	
	Page 63		Page 65
1	Page 63 O. All right. And you told us that the statement	1	Page 65 O. Do you recall telling Abby Conley that you
1 2	Q. All right. And you told us that the statement	1 2	Page 65 Q. Do you recall telling Abby Conley that you wanted you wanted Deanna Cosby to call you?
1 2 3	Q. All right. And you told us that the statement regarding the death of [P.W.]'s son did not relate to		Q. Do you recall telling Abby Conley that you
2	Q. All right. And you told us that the statement	2	Q. Do you recall telling Abby Conley that you wanted you wanted Deanna Cosby to call you?
2	Q. All right. And you told us that the statement regarding the death of [P.W.]'s son did not relate to Ms. Jones' preparation of your case, the matter she was	2	Q. Do you recall telling Abby Conley that you wanted you wanted Deanna Cosby to call you?  A. No. I told Abby Conley that I wanted Deanna to
2 3 4	Q. All right. And you told us that the statement regarding the death of [P.W.]'s son did not relate to Ms. Jones' preparation of your case, the matter she was working on for you. Is that right?	2 3 4	Q. Do you recall telling Abby Conley that you wanted you wanted Deanna Cosby to call you?  A. No. I told Abby Conley that I wanted Deanna to call my lawyer, and I gave her my lawyer's card. But I had
2 3 4 5	Q. All right. And you told us that the statement regarding the death of [P.W.]'s son did not relate to Ms. Jones' preparation of your case, the matter she was working on for you. Is that right?  A. Not directly. Not very much.	2 3 4 5	Q. Do you recall telling Abby Conley that you wanted you wanted Deanna Cosby to call you?  A. No. I told Abby Conley that I wanted Deanna to call my lawyer, and I gave her my lawyer's card. But I had Deanna's number, so I would have phoned her myself.
2 3 4 5 6	Q. All right. And you told us that the statement regarding the death of [P.W.]'s son did not relate to Ms. Jones' preparation of your case, the matter she was working on for you. Is that right?  A. Not directly. Not very much.  Q. It was extraneous to whatever was going on in your	2 3 4 5 6	<ul> <li>Q. Do you recall telling Abby Conley that you</li> <li>wanted you wanted Deanna Cosby to call you?</li> <li>A. No. I told Abby Conley that I wanted Deanna to</li> <li>call my lawyer, and I gave her my lawyer's card. But I had</li> <li>Deanna's number, so I would have phoned her myself.</li> <li>Q. What was your phone number back in May of 2004?</li> </ul>
2 3 4 5 6 7	Q. All right. And you told us that the statement regarding the death of [P.W.]'s son did not relate to Ms. Jones' preparation of your case, the matter she was working on for you. Is that right?  A. Not directly. Not very much.  Q. It was extraneous to whatever was going on in your case. Is that a fair statement?	2 3 4 5 6 7	<ul> <li>Q. Do you recall telling Abby Conley that you wanted you wanted Deanna Cosby to call you?</li> <li>A. No. I told Abby Conley that I wanted Deanna to call my lawyer, and I gave her my lawyer's card. But I had Deanna's number, so I would have phoned her myself.</li> <li>Q. What was your phone number back in May of 2004?</li> <li>A. I have no idea.</li> </ul>
2 3 4 5 6 7 8	Q. All right. And you told us that the statement regarding the death of [P.W.]'s son did not relate to Ms. Jones' preparation of your case, the matter she was working on for you. Is that right?  A. Not directly. Not very much. Q. It was extraneous to whatever was going on in your case. Is that a fair statement?  A. Yeah.	2 3 4 5 6 7 8	Q. Do you recall telling Abby Conley that you wanted you wanted Deanna Cosby to call you?  A. No. I told Abby Conley that I wanted Deanna to call my lawyer, and I gave her my lawyer's card. But I had Deanna's number, so I would have phoned her myself.  Q. What was your phone number back in May of 2004?  A. I have no idea.  Q. The phone number 814-868-8541, do you recognize that number?  A. That's Amy Jones' number.
2 3 4 5 6 7 8 9	Q. All right. And you told us that the statement regarding the death of [P.W.]'s son did not relate to Ms. Jones' preparation of your case, the matter she was working on for you. Is that right?  A. Not directly. Not very much. Q. It was extraneous to whatever was going on in your case. Is that a fair statement? A. Yeah. Q. Did Amy Jones tell you the source of that information, as far as where she how she came to know about [P.W.] the death of [P.W.]'s son?	2 3 4 5 6 7 8 9 10	<ul> <li>Q. Do you recall telling Abby Conley that you</li> <li>wanted you wanted Deanna Cosby to call you?</li> <li>A. No. I told Abby Conley that I wanted Deanna to</li> <li>call my lawyer, and I gave her my lawyer's card. But I had</li> <li>Deanna's number, so I would have phoned her myself.</li> <li>Q. What was your phone number back in May of 2004?</li> <li>A. I have no idea.</li> <li>Q. The phone number 814-868-8541, do you recognize that number?</li> <li>A. That's Amy Jones' number.</li> <li>Q. Is that Amy Jones'?</li> </ul>
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2 3 4 5 6 7 8 9 10	Q. All right. And you told us that the statement regarding the death of [P.W.]'s son did not relate to Ms. Jones' preparation of your case, the matter she was working on for you. Is that right?  A. Not directly. Not very much. Q. It was extraneous to whatever was going on in your case. Is that a fair statement? A. Yeah. Q. Did Amy Jones tell you the source of that information, as far as where she how she came to know about [P.W.] the death of [P.W.]'s son?  MS. SCARPITTI: Objection. Attorney/client privilege.	2 3 4 5 6 7 8 9 10 11 12 13	Q. Do you recall telling Abby Conley that you wanted you wanted Deanna Cosby to call you?  A. No. I told Abby Conley that I wanted Deanna to call my lawyer, and I gave her my lawyer's card. But I had Deanna's number, so I would have phoned her myself.  Q. What was your phone number back in May of 2004?  A. I have no idea.  Q. The phone number 814-868-8541, do you recognize that number?  A. That's Amy Jones' number.  Q. Is that Amy Jones'?  A. (Witness nods head.)  Q. And why did you want Deanna Cosby to call Amy
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1	you are conveying this information through Abby Conley, if	1	You know, I am not asking for any attorney
2	you had Deanna's telephone number and presumably could have	2	mental impressions or memos or anyone else. But
3	forwarded it to your attorney? There's no reason you could	3	you cannot shield the underlying information with
4	not have given that number to your counsel, was there?	4	a work product privilege.
	A. No. I think just because my counsel wanted them	5	MR. ANGELONE: Attorney/client privilege.
5	· · · · · · · · · · · · · · · · · · ·		
6	to call her.	6	MR. LANZILLO: That exploded the minute that
7	Q. And why is it that you didn't call Deanna and ask	7	Miss Conley stepped into the room.
8	her to call your lawyer?	8	MR. McNAIR: Absolutely not.
9	A. Because I think I probably assumed that Abby would	9	MR. JOYAL: Yes, it did.
10	be talking to her anyway. Also, I wanted to give Abby the	10	MS. SCARPITTI: No, it didn't.
11	card.	11	MR. LANZILLO: Let me inquire. Was Ms. Conley
12	Q. You wanted to what?	12	Attorney Jones' client?
13	A. I wanted Abby to have her number. Because my	13	MS. SCARPITTI: No, but Attorney Jones was talking
14	lawyer wanted to speak with Abby too.	14	to Miss Conley in order to prepare for her
15	Q. So your lawyer wanted to speak with Abby as well.	15	client's case. Unless Miss Conley then
16	A. Yes.	16	subsequently testified, her testimony would be
17	Q. And did you ask Abby to speak with your lawyer?	17	admissible, but anything that she had told Miss
18	MS. SCARPITTI: Objection. Attorney/client	18	Jones in regards to Miss Jones' representation of
19	privilege, and I'm instructing her not to answer.	19	[V.] is attorney/client privilege and
20	MR. LANZILLO: I would encourage you to reconsider	20	attorney/client work product.
21	that. I'm asking what she told Abby Conley.	21	MR. LANZILLO: As soon as counsel allows a third
22	Q. Did you tell Abby Conley that you would like her	22	party in the room with a client, the
23	to call your lawyer?	23	attorney/client privilege is gone. I don't want
l	•	24	to be argumentative, but I think every lawyer in
24	A. That, I don't remember. At the time it was mainly	25	
25	she wanted to talk to Deanna. But I know she wanted to talk	25	the room knows that. I can guarantee you that
	Page 67		Page 69
1	to Abby too.	1	Judge McLaughlin knows that. Do you really want
2	Q. Did Abby tell you that she would talk to your	2	to press that position? I will back off if you
3	lawyer?	3	tell me you do, but I don't believe you can hold
4	A. Maybe not come out and exactly say it, but I got	4	that information in good faith. I'll ask the
5	that impression.	5	question again.
ı	•	6	BY MR. LANZILLO:
6	Q. You understood that she was willing to do that.	7	Q. What was said during that meeting where Abby
7	A. Yeah.	1	
8	Q. Did Abby ever tell you that she spoke with your	8	Conley was present with you and Amy Jones?
9	lawyer?	9	MS. SCARPITTI: I'm going to object again and
10	A. No. Not until the one time I knew for sure that	10	instruct her not to answer.
11	she did.	11	MR. LANZILLO: Based on the attorney/client
12	Q. What did Abby tell you about that?	12	privilege?
13	<ul> <li>A. Well, my lawyer called her in for a like an</li> </ul>	13	MS. SCARPITTI: Yes.
14	interview kind of thing, and I was there. So she didn't	14	MR. JOYAL: Let's call him now, Rich, because we
15	have to tell me.	15	need to get this done today, based on the
16	Q. You were present for that.	16	deadlines for summary judgment. And
17	A. Yeah.	17	Miss Scarpitti can make her argument to the Court.
18	Q. What was said during that meeting?	18	(Discussion held off the record.)
19	MS. SCARPITTI: Objection. Goes to	19	(The following discussion was held on the record
20	attorney/client privilege. It's attorney work	20	with Judge McLaughlin:)
21	product.	21	THE COURT: All right. This is the Judge. What's
l	·	22	going on?
22	MR. LANZILLO: That's not no. You know, I have	1	
23	been thinking about this work product privilege,	23	MR. LANZILLO: Judge, this is Rich Lanzillo
24	and statements made by third parties are not work	24	calling in the Abby Conley case. I'm representing
25	product. They are not evidence.	25	the County of Erie. Counsel for all of the
Щ.		1	

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1	parties are present in my conference room for the	1	another hearing scheduled on it next week.
2	deposition of [V.W.]. Ms. [W.] is separately	2	Ms. [W.] was involved with OCY. She's now in the
3	represented by Alison Scarpitti, and we have an	3	middle of involuntary termination procedures.
4	objection and an instruction not to answer a	4	Ms. Jones represented her up through that during
5	series of questions based upon the attorney/client	5	the permanency hearings, the detention orders, all
6	privilege.	6	of that. So it's my understanding that at that
7	THE COURT: Who is [V.W.]?	7	time they were, I believe, given the time period,
8	MR. LANZILLO: She was a client of OCY. In a	8	preparing for either the another permanency
9	nutshell, Judge, she's important, very important	9	hearing, or they were preparing for the change of
10	to the defense of the case because this she's	10	goal hearing.
11	the witness who closes the loop whereby we will	11	THE COURT: All right. Well, in any event, here
12	establish that Ms. Conley repeatedly leaked	12	is my ruling: Just so we have the procedural cart
13	confidential information regarding confidential	13	behind the horse here, I take it, then,
14	cases and pending cases through other third	14	Miss Scarpitti, that well, Mr. Lanzillo, this
15	parties, with the intention that that information	15	is coming on by way of motion to compel testimony
16	get back to opposing parties and their counsel.	16	Is that it?
17	Ms. [W.] is the witness who closes that loop for	17	MR. LANZILLO: Well, yes, Your Honor. We're
18	us.	18	raising it here in the deposition so as not to
19	The questions I am asking relate to a meeting	19	have to trouble the Court with a paper motion.
20	between or among the Plaintiff, Abby Conley,	20	THE COURT: All right. The motion is granted.
21	and Ms. [W.] and her then attorney, Amy Jones.	21	Number one, I see no attorney/client privilege,
22	Ms. Scarpitti has invoked the attorney/client	22	given the circumstances surrounding the interview.
23	privilege, saying that the information that	23	Number two, I see no violation of work product
24	Ms. Conley was providing to Ms. [W.] in connection	24	doctrine because for the simple reason that
25	with pending OCY cases is somehow protected by the	25	Miss Jones' attorney's notes, documents, mental
	Page 71		Page 7
1	attorney/client privilege. I take the position	1	impressions, et cetera, are not being requested or
2	THE COURT: Well, there's a third how can that	2	asked to be divulged here. Rather, it's the
3	be if there's a third party there?	3	independent testimony of this witness. So the
4	MR. LANZILLO: That's my that's my point, Your	4	motion to compel is granted, and I find the basis
5	Honor. And I don't want to speak for	5	for directing the client not to answer not
6	Ms. Scarpitti. Maybe she could explain her	6	well-founded.
7	position.	7	Anything else?
8	THE COURT: What's your position, Ms. Scarpitti?	8	MR. LANZILLO: Yes, Judge, if we may and this
9	MS. SCARPITTI: Your Honor, my position is that	9	will likely save a paper motion in a couple of
10	because at the time it appears that Attorney Jones	10	days. The precise same objections were raised and
11	was interviewing Miss Conley with regard to her	11	instructions given during the deposition of Amy
13	hoing a notantial witness in the case, that that's	12	Jones concerning the same topics. If counsel is
12	being a potential witness in the case, that that's		somes concerning the same topics. It counted is
		13	agreeable, I would like to raise that with the
12 13 14	attorney work product and that that would be	13 14	
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1	MS. SCARPITTI: Phil Friedman, Your Honor.	1	A. Yes. Yes.
2	THE COURT: Well, I can't resolve that today, Mr.	2	Q. Okay. She did tell you that. She told your
3	Lanzillo, in the absence of Mr. Friedman. I	3	attorney that too, did she not?
4	presume he was the one who raised the objection.	4	A. She told my attorney.
5	MR. LANZILLO: He wasn't present, Your Honor, but	5	Q. And did you talk about the detention of your
6	I understand. We'll raise that by other means.	6	unborn child upon the anticipated detention of your
7	THE COURT: At another time when everybody who	7	unborn child?
8	needs to be around the table is there. All right.	8	A. Not that I recall. I talked to my lawyer about
9	MR. LANZILLO: Thank you, Judge.	9	it, but I don't think with her there. I don't think with
10	MS. SCARPITTI: Thank you, Judge.	10	Abby there.
11	(End of discussion with Judge McLaughlin.)	11	Q. Do you remember how long your meeting with your
12	BY MR. LANZILLO:	12	lawyer and Ms. Conley went?
13	Q. Let me go back to my last line of questioning,	13	A. Probably about 45 minutes to an hour.
14	Ms. [W.] and ask you, first of all, why was Ms. Conley	14	Q. Did you talk about [P.W.]?
15	sitting in an interview with you and your lawyer? What is	15	A. Probably. At least indirectly, because she was my
16	your understanding?	16	caseworker at the time.
17	<ul> <li>A. It was in preparation for a trial that I had</li> </ul>	17	Q. Did Miss Conley make any comments about Ms. [W.]?
18	coming up.	18	A. I don't think so. Not that I recall.
19	Q. Which trial?	19	Q. Did Ms. Conley ever make any statement to you at
20	A. Probably a permanency hearing. I'm not positive.	20	any time, not just during that meeting, regarding her views
21	Q. And did you understand that Ms. Conley or was	21	of Ms. [W.] in terms of her you know, her spirituality or
22	it your belief that Ms. Conley had information that you and	22	her religion?
23	your attorney could use to further or improve your position	23	A. No.
24	in that trial?	24	Q. Did she ever characterize her as satanic or
25	A. Yeah, by her testimony.	25	anything like that?
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		•	b 77
1	Page 75 O. All right. And that that meeting was in part to	1	Page 77 A. No.
1 2	Q. All right. And that that meeting was in part to	1 2	A. No.
2	Q. All right. And that that meeting was in part to prepare Ms. Conley for her deposition I mean, for her	1	_
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Page 78  A. Yes.  Old Ms. Conley tell you whether she was meeting with your counsel with with permission from the Office of Children and Youth?  MR. McNAR: Objection. Irrelevant.  A. No. She didn't themson that. Was there any discussion by Ms. Jones concerning whether this represented an ex partle communication? You don't know what that it is, do you?  No. A. No. That's not fair. Was there any discussion with 10. Q. That's not fair. Was there any discussion with 11. Q. That's not fair. Was there any discussion with 12. Ms. Jones regarding whether it was permissable or 13. A No. Somes regarding whether it was permissable or 14. A. Hult-uh.  MR. MCHAIC: Was there any discussion with 15. Q. That's not fair. Was there any discussion with 15. Q. That's not fair. Was there any discussion with 15. Q. That's not fair. Was there any discussion with 15. Q. That didn't cone up?  A. In Constraint was the said. A No. Something was thought up about stolen 16. A. No. Something was thought up about stolen 16. A. No. Something was thought up about stolen 16. A. No. Something was thought up about stolen 16. A. No. Something was thought up about stolen 16. A. No. Something was thought up about stolen 16. A. No. Something was thought up about stolen 16. A. No. Something was thought up about stolen 16. A. No. Something was thought up about stolen 16. A. No. Something was thought up about stolen 17. A. Indon't nemented that was -18. A. I don't tensented a subpensa. 18. A. I don't tensented with a was on issue. Page 79. A. I mean, I don't tensented with subpocensa being stolen by or a COCY?  A. I don't remember much about the details. 2. Q. But you do remember Ms. Conley? Some 2. A. I don't remember that it was an issue. Q. But you do remember Ms. Conley? Some 2. A. I don't remember that it was an issue. Q. Do you have an understand Ms. Conley? Some 2. A. I don't remember that it was an issue. Q. Do you have an understanding as to how your 18. A. No. Some 2. A. She spoke with Deanna over the phone. That was 18. Start over. Do you	Г			
2 Q. Did Ms. Conley tell you whether she was meeting 3 with your counsel with — with permission from the Office of Children and Youth? 5 MR. McNAIR. Objection. Irrelevant. 6 A. No. She didn't tell me. 7 Q. She didn't merition that. Was there any discussion 8 by Ms. Jones concerning whether this represented an ex parte 6 communication? You don't know what that is, do you? 10 A. No. 11 Q. That's not fair. Was there any discussion with 11 Ns. Jones regarding whether it was permissible or 12 Ms. Jones regarding whether it was permissible or 13 appropriate for this meeting to be taking place? 14 A. Huhth. 15 Q. That didn't come up? 16 A. No. Something was brought up about stolen 17 subperposite for this meeting to be taking place? 18 A. No. Something was brought up about stolen 19 subpersors or something like that. 19 Q. What was tha? Who brought that up? 20 A. I mean, I don't know. It was brought up— 21 something about that Office of Children and Youth has been 22 Q. And did Ms. Conley tell you that? 23 A. Yeah. I don't think it was to me. It was—it 24 was to my lawyer. 25 Q. But you do remember Ms. Conley belling your lawyer 26 that there had been a problem with subpoenas being stolen by or at CO?? 27 Q. Do you have an understanding as to how your lawyer 28 came to understand Attorney Conley's views or came to understanding as to how your lawyer 29 Q. Do you have any understanding as to how your lawyer 30 Q. Do you have any understanding as to how your lawyer 31 Do you have any understanding as to how your lawyer 32 A. She spick with Deanna over the phone. That was 34 Page 79 35 Q. Do you have any understanding as to how your lawyer 36 A. Pash. Shores picked problem with here or being with 37 her. I'm not sure. 38 Q. Did your actorney, Ms. Sones, meet with anyone 39 else from OCY, other than Ms. Conley? 30 A. She spicke with Deanna over the phone. That was 30 Page 80 Q. Did your actorney. Ms. Jones, meet with anyone 31 else from OCY, other than Ms. Conley? 32 Q. Did you have ernali at the time? 34 A. Yea. 35 Q. Di	1	-	1	
with your counsel with — with permission from the Office of Children and Youth?  MR. ANGLONE: I'm going to object. I think it's mischaracterizing what she said.  A. No. She didn't menton that. Was there any discussion by Ms. Jones concerning whether this represented an ex parte communication? You don't know what that is, do you?  A. No.  That's not fair. Was there any discussion with Q. That's not fair. Was there any discussion with Q. That's not fair. Was there any discussion with MR. ANGELONE: She just remember it coming up, I thought she had said. She doesn't remember who.  A. No.  MR. LANZILLO: Well, she can correct — MR. ANGELONE: I fair just the problem I have with speaking objections.  MR. ANGELONE: I apologize.			_	-
4 Children and Youth? 5 MR. McNLR: Objection. Irrelevant. 5 MR. McNLR: Objection. Irrelevant. 5 MR. McNLR: Objection. Irrelevant. 6 A. No. She didn't tell me. 7 Q. She didn't mention that. Was there any discussion by Ms. Jones concerning wheat this represented an ex parts of the communication? You don't know what that is, do you? 10 A. No. 11 Q. That's not fair. Was there any discussion with 11 MR. AMCELONE: She just remembers it coming up, I thought she had said. She doesn't remember who. A Yeah, I don't remember if it was — 12 MR. AMCELONE: She just remembers it coming up, I thought she had said. She doesn't remember who. A Yeah, I don't remember if it was — 14 MR. AMCELONE: She just remember who is passating objections. She just remember who is passating objections. MR. LANZILLO: See, that's the problem I have with 12 special objections in the problem of the way and the problem of the was subpoenas. 12 MR. AMCELONE: The going because the though objection is passating objections. 14 Hun-uh. 15 Q. That didn't come up? 15 MR. LANZILLO: Yell, she can correct — 16 MR. AMCELONE: She just remember it was — 16 MR. AMCELONE: She just remember who a problem it have with 15 MR. AMCELONE: She just remember it was — 16 MR. AMCELONE: She just stem correct — 18 MR. AMCELONE: She just stem correct — 18 MR. AMCELONE: She just stem correct — 18 MR. AMCELONE: She just stem correct — 19 MR. AMCELONE: She just remember it was — 18 MR. AMCELONE: She just stem correct — 19 MR. AMCELONE: She just stem correct				·
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6 A. No. She didn't tell me. 7 Q. She didn't meriton that. Was there any discussion by Ms. Jones concerning whether this represented an ex parte communication? You don't know what that is, do you? 9 A. No. 10 A. No. 11 D. That's not fair. Was there any discussion with 11 proportion for the meeting to be taking place? 12 Ms. Jones regarding whether it was permissible or appropriate for this meeting to be taking place? 13 A. Huh-tuh. 15 Q. That didn't come up? 16 A. No. Something was brought up about stolen 17 subpopriate for this meeting to be taking place? 17 A. No. Something was brought up about stolen 18 subpoenas or something like that. 18 Q. What was that? Who brought that up? 19 A. I mean, I don't frown. It was brought up - 20 something about that Office of Children and Youth has been 20 was to my lawyer. 21 known to steal subpoenas. 22 Q. And did Ms. Conley tell you that? 23 A. Yeah, I don't tremember much about the details. 24 was to my lawyer. 25 Q. But you do remember Ms. Conley telling your lawyer that there had been a problem with subpoenas being stolen by OCT, is who was telling who. But I remember if it was — 24 who was telling who. But I remember if it was — 25 MR. LANZILLO: Well, she can correct — 26 MR. LANZILLO: See, that's the problem I have with 19 speaking blections. 27 Q. What was that? Who brought that up? 28 came to understand ble that up? 29 A. I don't that Coffice of Children and Youth has been 20 blection phrased as it was, the testimony is 10 lawyer. 29 A. I don't the was to my lawyer. 20 A. I don't the member much about the details. 20 Q. But you do remember Ms. Conley stelling your lawyer that there had been a problem with subpoenas being stolen by or at OCT? 30 A. I don't remember much about the details. 40 Page 31 41 A. I don't remember much about the details. 41 Stolen subpoenas. I remember that it involved her like it was now on the resuppoenas that had been stolen, or something to to that effect. 41 Stolen subpoenas. I remember that had been stolen, or something to to that effe	l		l	
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8 by Ms. Jones concerning whether this represented an ex parte communication? You don't know what that is, do you? A. No. A. Yeah, I don't remember if it was — MR. LANZILLO: See, that's the problem I have with speaking objections. MR. ANGELONE: I apologize. MR. LANZILLO: Yeah. Actually, I'd like to hear it from the witness. The asking—I understood her testimony earlier to have been that Ms. Conley something about that Office of Children and Youth has been known to steal subpoenas. Q. What was that? Who brought that up? A. I don't remember much about the details. Q. And did Ms. Conley tell you that? A. A Yeah, I don't think it was to me. It was—it was the me had been a problem with subpoenas being stolen by or at CCC? A. I don't remember much about the details. Q. But you do remember Ms. Conley telling your lawyer that there had been a problem with subpoenas being stolen by or at CCC? A. I don't remember much about the details. Q. Do you have an understanding as to how your lawyer case? MR. CANAIR: Who is attorney Conley's views concerning your case? MR. McNAIR: Who is Attorney Conley's views concerning your autometer with a many case? MR. CANAIR: Who is Attorney Conley's views concerning your autometer with a many case? MR. CANAIR: Who is Attorney Conley's views concerning your autometer with a many case it was after she moved. I believe she met with 1sa Ropycinski from Project First. And I believe she met with Usa Babo from CVS. Q. Did you aver arbit bean accept would call bean a Cosby, from where would you call her? A. Yeah, I don't remember with the understand discovery personnel other than Ms. Conley.  By MR. LANZILLO: Yeah, Actually, I'd like to hear it from the withses. The asking - Loder testimony is told her lawyer about - in her presence, told her testimony is told her lawyer about - in her presence, told her lawyer about - in her presence, told her lawyer about - in her presence, told her lawyer			_	·
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Ms. Jones regarding whether it was permissible or appropriate for this meeting to be taking place?  A A Huh-tuh.  5 Q. That didn't come up?  6 A. No. Something was brought up about stolen subpoenas or something like that.  7 Subpoenas or something like that.  8 Q. What was that? Who brought that up?  9 A. I mean, I don't know. It was brought up - something about that Office of Chilidren and Youth has been known to steal subpoenas.  9 Q. And did Ms. Conley tell you that?  10 A. Yeah. I don't think it was to me. It was it was it was to my lawyer.  11 A. I don't remember much about the details.  12 Q. But you do remember Ms. Conley telling your lawyer that there had been a problem with subpoenas being stolen by or at COt?  13 A. I don't remember much about the details.  14 Q. But you do remember fit was it that there had been a problem with subpoenas being stolen by or at COt?  15 A. I don't remember if it was it that there had been a problem with subpoenas being stolen by or at COt?  16 A. Probably just the was an issue.  17 Q. Droy u have an understanding as to how your lawyer action again.  18 You have any understanding as to how your lawyer adout the details.  19 Q. I'm sorry. How Abby Conley - strike that. I'll start over.  10 A. I don't remember that was an issue.  10 Q. I'm sorry. How Abby Conley - strike that. I'll start over.  11 Q. I'm sorry. How Abby Conley - strike that. I'll start over.  12 attorney, Amy Jones, came to understanding as to how your lawyer had to said something to me about having to main the firm of the time?  12 attorney, Amy Jones, came to understand Ms. Conley's views a fee from OCY, other than Ms. Conley?  13 A. Probably just by talking with her or being with her or b	1			·
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18 told her lawyer about — in her presence, told her 19 A. I mean, I don't know. It was brought up — 19 Something about that Office of Children and Youth has been 20 what I understood. And, you know, with the 20 what I understood. And, you know, with the 21 objection phrased as it was, the testimony is 22 changing a little bit, but I'm going to ask the 22 changing a little bit, but I'm going to ask the 23 question again. 24 BY MR. LANZILLO: 25 Q. What do you remember Ms. Conley saying about these 27 Q. But you do remember Ms. Conley telling your lawyer 28 that there had been a problem with subpoenas being stolen by 3 stolen by 3 don't remember much about the details. 4 or at OCY? 4 I don't remember Ms. Conley telling your lawyer 2 A. I don't remember Ask Conley telling your lawyer 3 that there had been a problem with subpoenas being stolen by 3 stolen by 6 MR. LANZILLO: 25 Q. What do you remember Ms. Conley saying about these 20 A. I don't remember much about the details. 4 was one of her subpoenas? 1 stolen subpoenas? 1 stolen subpoenas 1 to that there had been a problem with subpoenas being stolen by 6 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you know, with the 4 What I understood. And, you by Conley - Some had the full what I understood. And, you by Conley - Some had the full what I understood. And, you be the stimony is division plane to the store in what I understood. And, you was the funderstood. And, you was the full what I understood. And, you wa	1	·	İ	~
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24 was to my lawyer. 25 Q. Miss Conley told you  Page 79  A. I don't remember much about the details. 2 Q. But you do remember Ms. Conley telling your lawyer 3 that there had been a problem with subpoenas being stolen by 4 or at OCY? 5 A. I don't yeah. I don't remember if it was 6 who was telling who. But I remember that was an issue. 7 Q. Do you have an understanding as to how your lawyer 8 came to understand Attorney Conley's views concerning your 9 case? 10 MR. McNAIR: Who is Attorney Conley? 11 Q. Tim sorry. How Abby Conley strike that. I'll 12 start over. 13 Do you have any understanding as to how your 14 attorney, Amy Jones, came to understand Ms. Conley's views 15 regarding the case? 16 A. Probably just by talking with her or being with 16 Ther. I'm not sure. 17 A. I don't remember Ms. Conley and the stolen subpoenas? 18 Q. Did you have e-mail at the time? 19 else from OCY, other than Ms. Conley? 20 A. She spoke with Deanna over the phone. That was 21 because it was after she moved. I believe she met with Lisa Babo from CVS. 24 Q. But no other OCY personnel other than Ms. Conley. 25 Q. What do you remember Ms. Conley saying about these  Page 79  Rage 81  Stolen subpoenas. I remember that it involved her like it was one of her subpoenas that had been stolen, or something to that effect. Q. Well, but Abby was talking Abby was the one who was sharing the information, wasn't she? A. I think so. I don't remember exactly. I remember mull Abby's subpoena to her house or somewhere else, because there it is happened that her supervisor has stolen a subpoena. 13 Q. Did you ever call Deanna Cosby's cell phone to talk to her? 15 A. Yes. 26 Q. And when you would call Deanna Cosby, from where would you call her? 27 A. From my I believe my cell phone. I don't would you call her? 28 A. From my I believe my cell phone. I don't would you call her? 29 Believe I had a house phone at the time. 20 Do you still have that same cell phone?	l	· · · · · · · · · · · · · · · · · · ·		
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	122	Delieve SHE THEL WILL LIST DADO ITOM CVS.	1 43	peneve i nau a nouse phone at the time.
23 A. NO.	1		24	O Do you still have that same sell above?
	24	Q. But no other OCY personnel other than Ms. Conley.	l	•

	Page 82		Page 84
1	Q. Who was your cell service at the time?	1	[R.]?
2	A. I think Cellular One. It was no, T-Mobile.	2	A. No.
3	Q. T-Mobile?	3	MR. JOYAL: Objection.
4	A. Yes.	4	Q. Do you know how the Office of Children and Youth
5	Q. And was the cell account in your name?	5	came into possession of the letters that Mr. Joyal has shown
6	A. Yes.	6	you today?
7	Q. Did you call Abby Conley from that phone?	7	A. No. They must have asked him for them, and he
8	A. Yes. That's if I didn't have a house phone at the	8	must have just sent them.
9	time. I don't think I did. I could be mistaken.	9	Q. Did you talk to [R.]?
10	Q. And is that the number that Deanna Cosby and	10	A. No.
11	Miss Conley would use to contact you as well?	11	Q. Okay. So you haven't talked to [R.]?
12	A. Yeah.	12	A. No.
13	Q. That seems logical, if you didn't have a house	13	Q. Did you yourself well, first of all, there was
14	phone at the time.	14	some discussion between you and Abby about an incident Abby
15	A. Yes.	15	witnessed where [P.W.] grabbed your daughter [D.] by the
16	MR. LANZILLO: Thank you, Miss [W.].	16	face and shook it and yelled at her.
17		17	A. Yes.
18	CROSS-EXAMINATION	18	Q. Okay. And you didn't did you witness that
19	BY MR. McNAIR;	19	incident?
20		20	A. Not that incident, no.
21	Q. Ms. [W.], first of all, you said that you received	21	Q. Did you ever witness an incident where [P.W.]
22	some information from Deanna Cosby about a detention order.	22	inappropriately handled your daughter?
23	A. Yes.	23	A. Yes.
24	Q. Was that information accurate?	24	Q. Okay. And do you recall about when that was?
25	A. No.	25	A. Right after sometime in July of '04.
		$\vdash$	0
1	Page 83 Q. Was the information that she related to you the	1	Page 85 Q. After [M.] was born.
2	same information that was on the detention order?	2	
3			A. Yes.
	A. No.	3	
		1	Q. Okay. And what did you see [P.W.] do?
4 5	A. No.     Q. What did the detention order say when you finally saw it?	3	
4 5	Q. What did the detention order say when you finally saw it?	3 4	<ul><li>Q. Okay. And what did you see [P.W.] do?</li><li>A. I saw her grab my daughter by the arm and lift her</li></ul>
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4 5	Q. What did the detention order say when you finally saw it?  A. It was dated way back to before [P.W.] even told me to do certain things to prevent it. And it was that the	3 4 5 6	Q. Okay. And what did you see [P.W.] do?  A. I saw her grab my daughter by the arm and lift her up real real fast and roughly and yell at her in her face and make her cry.
4 5 6 7 8	Q. What did the detention order say when you finally saw it?  A. It was dated way back to before [P.W.] even told me to do certain things to prevent it. And it was that the custody was going to go to the grandmother. Deanna said it	3 4 5 6 7	<ul><li>Q. Okay. And what did you see [P.W.] do?</li><li>A. I saw her grab my daughter by the arm and lift her up real real fast and roughly and yell at her in her face and make her cry.</li><li>Q. And your daughter started crying?</li></ul>
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	Page 96		Page 99
1	Page 86 Q. Do you know if Lisa reported that?	1	Page 88 Q. You also said you talked to a Mike Kazmer?
2	A. I don't know.	2	A. Yes.
3	Q. Now, after you saw this incident where Ms. [W.]	3	Q. And who is he?
4	grabbed your daughter by the arm and would shake her, I	4	A. He, I believe, is from the DPW, maybe.
5	think you said you tried to report that to Miss Deveney?	5	Q. Okay.
6	A. Yes.	6	A. The head of an organization like that.
7	Q. How did you try to make that report?	7	Q. Okay. And how did you get to talk to him?
8	A. I called her several times. I could never get	8	A. Deanna gave me the contact information.
9	through, so eventually I just left a voicemail.	9	Q. And what did Mr. Kazmer say when you told him what
10	Q. You didn't leave a voicemail the first time you	10	you had witnessed?
11	called?	11	A. He said that he would he was much more friendly
12	A. I called her and asked her to please call me back	12	than the first two and said he would do an investigation
13	several times; that it was important.	13	about it.
14	Q. Do you recall about how many times you called?	14	Q. Okay. Did you ever receive anything from the DPW
15	A. About three or four times.	15	saying that an investigation was done with regard to that
16	Q. Okay. And then ultimately you did leave a	16	incident?
17	voicemail?	17	A. (No response.)
18	A. Explaining the whole situation.	18	Q. A notice letter like you got with the first one?
19	Q. Explaining what you had seen?	19	A. No. I only got one about the other incident.
20	A. Yes.	20	Q. Did Mr. Kazmer ever advise you of the results of
21	Q. And did she respond to that?	21	his investigation?
22	A. No.	22	A. I don't believe so.
23	Q. All right. You also said you reported it to Pam	23	Q. Do you know if he talked to [P.W.]?
24	Biroscak?	24	A. I'm not sure.
25	A. Yes.	25	Q. Is that case file that OCY keeps on your case
_			
1	Page 87	,	Page 89 secret, or are you allowed to see that?
1 2	Q. And who is Pam Biroscak?	1 2	secret, or are you allowed to see that?
2	<ul><li>Q. And who is Pam Biroscak?</li><li>A. It is, I believe, Sue Deveney's supervisor.</li></ul>	2	secret, or are you allowed to see that?  A. I'm supposed to be allowed to see it, but I
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	Page 90		Page 9
1	A. Yes.	1	Q. Okay. So was that the first time you had heard
2	Q. Okay. How many times did Ms. [W.] visit you?	2	about that?
3	A. Twice.	3	A. Yes.
4	Q. Twice?	4	Q. So Abby hadn't told you that before Lisa did?
5	A. (Witness nods head.)	5	A. No. Lisa was the first one to tell me that.
6	Q. And when did she start? In January or February?	6	Q. Did you ever discuss that incident with Abby after
7	A. February, I believe.	7	that?
8	Q. Okay. And between February and when did she	8	A. I think so.
9	stop being your caseworker?	9	Q. But just so we're clear, the first time you heard
10	A. I don't remember.	10	of an incident of [P.W.] roughly handling your child was
11	Q. Okay. So she came and visited you at home twice.	11	from Lisa Kopycinski.
12	A. Yes.	12	A. Yes.
13	Q. And on how many occasions did she visit did she	13	MR. McNAIR: That's all I have.
14	observe you visiting with your children?	14	MR. JOYAL: Ms. [W.], I want to do some follow-up.
15	A. Twice also.	15	
16	Q. Okay. Did she stay for the entire visit?	16	REDIRECT EXAMINATION
17	A. No. She never did.	17	BY MR. JOYAL:
18	Q. How long would she stay when she visited you in	18	
19	your home?	19	Q. Do you know, other than the meeting that you were
20	A. In my home?	20	present at between Amy Jones, yourself, and Abby Conley, do
21	Q. Yeah.	21	you know whether there were any other meetings between Ar
22	A. I think once was like a half an hour, once was	22	Jones and Abby Conley that you weren't present at?
23	like 20 minutes, maybe.	23	A. I don't believe so.
24	Q. Was there a schedule that was set by the Court for	24	Q. Okay. During the course of the meeting that you
25	you to receive services from the Office of Children and	25	had, that you said took about 45 minutes, did Abby Conley
-	Page 91		Page 9
1	Youth?	1	divulge in response to any questions from Ms. Jones the
2	A. I'm not sure.	2	content of any meetings that had been held that she told you
3	Q. Okay. Do you recall whether or not there was ever		
-		3	about, that are set forth in the letter, the meetings
4	a hearing where the Judge indicated that she wanted more	3	- · · · · · · · · · · · · · · · · · · ·
	a hearing where the Judge indicated that she wanted more attention paid to your case?	1	- · · · · · · · · · · · · · · · · · · ·
4	a hearing where the Judge indicated that she wanted more attention paid to your case?  A. Yes.	4	between Sue Deveney and [P.W.] and whoever about your case
4 5 6	attention paid to your case?  A. Yes.	4 5	between Sue Deveney and [P.W.] and whoever about your case A. I don't remember.
4 5 6 7	attention paid to your case?  A. Yes.  Q. And who was that Judge?	4 5 6	between Sue Deveney and [P.W.] and whoever about your case.  A. I don't remember.  Q. You don't remember that.  A. Hum-um.
4 5 6	<ul><li>attention paid to your case?</li><li>A. Yes.</li><li>Q. And who was that Judge?</li><li>A. I believe it was Elizabeth Kelly.</li></ul>	4 5 6 7	between Sue Deveney and [P.W.] and whoever about your case  A. I don't remember.  Q. You don't remember that.
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Yes. Q. And who was that Judge? A. I believe it was Elizabeth Kelly. Q. And when was that hearing? A. That, I'm not sure. It was around the time of the birth of [M.]. Q. Okay. And when Deanna was your caseworker, how often would she come to your house? A. I think once a week. Q. Okay. And how often would she observe you with your children? A. Once a month. (Discussion held off the record.) Q. Did Lisa Kopycinski ever tell you about any incident involving [P.W.] and your daughter [D.]? A. No. Oh. Yes, actually, she did. She told me about Abby; the one Abby witnessed.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	between Sue Deveney and [P.W.] and whoever about your case?  A. I don't remember.  Q. You don't remember that.  A. Hum-um.  Q. You don't like [P.W.]; is that right?  A. Hum-um.  Q. And you have never liked [P.W.]; is that right?  A. No.  Q. Right? You called her a "fucking bitch" in one of the letters, didn't you?  A. Yes.  Q. Who is Lisa Kopycinski?  A. She is from Project First Step.  Q. Project First Step. Now, you say that Lisa  Kopycinski told you that she saw the incident that Abby  Conley reported about [P.W.].  A. No. She didn't tell me she saw it.  Q. Oh. What did she tell you?  A. She told me that there was an incident.

	Page 94		Page 96
1	Q. You don't know. Would it have come from the only	1	Q. Happened after the incident.
2	witness to it, Miss Conley?	2	MR. McNAIR: After what incident?
3	A. It seems likely, but I don't know for sure.	3	Q. Happened after the birth of your child.
4	Q. Most likely. Now, tell me about Lisa what is	4	A. Yes.
5	her name? Babel?	5	Q. Happened after you had been told by Abby Conley
6	A. Babo.	6	about the plans that OCY had for your case, right?
7	Q. Babo. Who does Lisa work for?	7	A. She never told me about the plans.
8	A. CVS, through Family Ties.	8	Q. Well, she did. You said she told you in one of
9	Q. I'm sorry?	9	the letters we talked about, about the meetings that were
10	A. CVS, through Family Ties.	10	being held.
11	Q. What kind of an organization is CVS?	11	A. Yeah.
12	A. They supervise visits.	12	Q. Okay. After she had told you all this stuff about
13	Q. They are sort of social worker types?	13	what OCY had planned on doing, this is when the incident
14	A. Yes.	14	that you say that you were the only person that saw
15	Q. Do you know under the law that such a person would	15	happened.
16	be a mandated reporter to report evidence, incidents of	16	A. Yes.
17	child abuse?	17	Q. This was after you had written the letters to [R.]
18	A. No, I didn't know.	18	talking about what you would have done to [P.W.] if you had
19	Q. You didn't. Well, I'm going to tell you that it	19	been there on the date that she allegedly grabbed [D.] by
20	would be. And that there was no report made by Lisa Babo	20	the face.
21	pursuant to statute, under statutory requirement, to anyone	21	A. Yes.
22	concerning any incident involving [P.W.].	22	Q. Right?
23	With that information, would that change your	23	A. Yes.
24	recollection as to whether Lisa Babo ever told you about	24	Q. You didn't like her at all.
25	such an incident?	25	A. No.
<b></b>	Page 95		Page 97
1	A. No, she definitely told me about an incident.	1	Q. Deanna Cosby didn't like her, did she?
2	Q. Do you know Lisa Babo denied ever having given any	2	A. I don't think so.
3	type of information like that to anyone; denied that such an	3	Q. Okay. And Abby Conley didn't like her.
4	incident took place?	4	A. Didn't seem like it.
5	MR. McNAIR: Objection. Foundation.	15	
6	<ul> <li>Q. Did anybody ever tell you that there's a note in</li> </ul>		Q. Right. And these are all people and they were
-		6	doing things and got you involved in them to try to do
7	OCY files stating that she denied ever seeing such an	6 7	doing things and got you involved in them to try to do anything to help you get your kids back; is that right?
8	OCY files stating that she denied ever seeing such an incident?	6 7 8	doing things and got you involved in them to try to do anything to help you get your kids back; is that right?  MR. McNAIR: Objection.
8 9	OCY files stating that she denied ever seeing such an incident?  A. No.	6 7 8 9	doing things and got you involved in them to try to do anything to help you get your kids back; is that right?  MR. McNAIR: Objection.  A. I guess can you be more clear?
8 9 10	OCY files stating that she denied ever seeing such an incident?  A. No.  Q. Has Mr. McNair or Mr. Angelone or Miss Conley ever	6 7 8 9 10	doing things and got you involved in them to try to do anything to help you get your kids back; is that right?  MR. McNAIR: Objection.  A. I guess can you be more clear?  Q. Well, were all these things being done to try to
8 9 10 11	OCY files stating that she denied ever seeing such an incident?  A. No.  Q. Has Mr. McNair or Mr. Angelone or Miss Conley ever told you that they spoke to Lisa Babo, and Lisa Babo said	6 7 8 9 10 11	doing things and got you involved in them to try to do anything to help you get your kids back; is that right?  MR. McNAIR: Objection.  A. I guess can you be more clear?  Q. Well, were all these things being done to try to help you get your kids back?
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	Page 98		Page 100
1	MR. JOYAL: Well, I think that if you remember her	1	Q. Well, we're talking about the three of them.
2	deposition, I think it was a mutual agreement that	2	A. I mean, I never knew of [C.] and Abby having a
3	neither one of them work together, and that that	3	conversation.
4	happened.	4	Q. Okay. How about [C.] having a conversation with
5	BY MR. JOYAL:	5	the worker on the case? Who was the worker that was
6	Q. She was taken off your case. Do you know whether	6	assigned to the case after [P.W.]?
7	that happened before the birth of your child or after?	7	A. Michelle Schetter.
8	A. After.	8	Q. Do you have any recollection of any conversations
9	Q. Okay. You said that Deanna Cosby gave you Mike	9	between Michelle Schetter and [C.B.] concerning
10	Kazmer's information.	10	A. No.
11	A. Yes.	11	Q. Did Abby Conley ever tell you that she had
12	Q. How to contact him. Did you approach her to ask	12	contacted Deanna Cosby to ask her to help you?
13	that question, or did you call well, let me break it down	13	A. No.
14	this way: Before she gave you that information, did she	14	Q. Did Deanna Cosby ever tell you that Abby Conley
15	call you to ask you about this alleged incident after [M.]'s	15	had contacted her and asked her to help you?
16	birth?	16	A. No.
17	A. No. I called her and told her.	17	Q. Okay. Now, you say that T-Mobile was your cell
18	Q. You called her and told her about it?	18	phone provider?
19	A. Yes.	19	A. I believe so.
20	Q. And you still can't tell me what the date of this	20	Q. And that your conversations by telephone, as far
21	was supposedly, right?	21	as you know today, would have been via cell phone.
22	A. No.	22	A. I'm pretty sure. If I didn't have a house phone
23	Q. Do you remember after [M.] was born, being in the	23	at the time.
24	Erie County Courthouse during some dependency hearing or	24	Q. And if you did have a house phone, who is the
25	some status conference where well, strike that. Let me	25	provider for your service? Verizon?
	Page 99		Page 101
1	ask the question this way: Did Abby Conley ever tell you	1	A. I believe so.
2	that [C.B.] had some concerns about your interaction with	2	Q. Okay. So that they should have records of your
3	your newborn at a visit?	3	telephone conversations in May, June, July, and August,
4	MR. McNAIR: Object to the relevance.	4	right?
5	A. No.	5	A. Yeah.
6	Q. No?	6	Q. And the numbers. When Deanna Cosby called you in
7	A. No.	7	June to tell you about the detention order, the one that you
8	Q. Do you remember, did anyone ever tell you that the	8	talked about in your letter to [R.] on June 5th, did you
9	paternal grandmother of [M.] had some concerns about the way	9	expect that telephone call from her?
10	that you were interacting with her during a visit?	10	A. No.
11			
	A. Yes. My attorney did after a while.	11	Q. And did you ask her how she knew about the order?
12	Q. Your attorney did. And do you know whether or not	12	A. I believe so.
12 13	Q. Your attorney did. And do you know whether or not your attorney told you about that?	12 13	A. I believe so.  MR. McNAIR: We covered this. For crying out
1	Q. Your attorney did. And do you know whether or not your attorney told you about that?  A. Yes.	12 13 14	A. I believe so.     MR. McNAIR: We covered this. For crying out loud.
13	<ul><li>Q. Your attorney did. And do you know whether or not your attorney told you about that?</li><li>A. Yes.</li><li>Q. And did you change that behavior the next time you</li></ul>	12 13 14 15	<ul><li>A. I believe so.</li><li>MR. McNAIR: We covered this. For crying out loud.</li><li>Q. Did she tell you that Abby Conley gave her the</li></ul>
13 14 15 16	<ul><li>Q. Your attorney did. And do you know whether or not your attorney told you about that?</li><li>A. Yes.</li><li>Q. And did you change that behavior the next time you visited with your child?</li></ul>	12 13 14 15 16	A. I believe so.  MR. McNAIR: We covered this. For crying out loud.  Q. Did she tell you that Abby Conley gave her the information about the order?
13 14 15	Q. Your attorney did. And do you know whether or not your attorney told you about that?  A. Yes. Q. And did you change that behavior the next time you visited with your child?  A. No. My impression was that she wanted custody of	12 13 14 15 16 17	<ul> <li>A. I believe so.</li> <li>MR. McNAIR: We covered this. For crying out loud.</li> <li>Q. Did she tell you that Abby Conley gave her the information about the order?</li> <li>MR. McNAIR: I'm moving to terminate this</li> </ul>
13 14 15 16	<ul><li>Q. Your attorney did. And do you know whether or not your attorney told you about that?</li><li>A. Yes.</li><li>Q. And did you change that behavior the next time you visited with your child?</li></ul>	12 13 14 15 16	A. I believe so.  MR. McNAIR: We covered this. For crying out loud.  Q. Did she tell you that Abby Conley gave her the information about the order?

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25

terminating my --

MR. McNAIR: I'm going to call the Judge.

MR. JOYAL: You're not terminating my --

I've had it. I've had it with you.

Q. Okay. You can answer my question.

MR. McNAIR: I'm going to call the Judge because

26 (Pages 98 to 101)

23 your interaction with [M.].

conversation.

20 your testimony is that at no time did Abby Conley give you 21 any information concerning a conversation that was held

22 between the social worker, [C.B.], and Abby Conley about

A. No. I never knew of the two of them having a

24

	Page 102		Page 104
1	MR. McNAIR: You're wasting everybody's time.	1	Q. You understood, of course, because you had said in
2	Q. You can answer my question.	2	the letter earlier that you were happy that Abby Conley had
3	A. She told me, based on who my caseworker was, she	3	actually filed the complaint, so you knew Abby was the
4	had already moved to termination, rather than reunification.	4	complainant, right?
5	Q. Did she tell you that Abby Conley had told her	5	A. Yes.
6	that there was an order outstanding?	6	Q. All right. And then you later found out that DPW
7	A. No.	7	had found Miss Conley's complaint to be unfounded.
8	MR. JOYAL: I have no other questions.	8	A. (Witness nods head.)
9	MR. LANZILLO: I have just a couple. Are you	9	Q. It seems logical to me and I don't want to put
10	okay? Do you have a minute? I have about one or	10	words in your mouth that that is something that you two
11	two more questions. Are you okay for about four	11	would talk about in later conversation. Didn't you talk
12	minutes?	12	about that with Ms. Conley?
13	THE WITNESS: Yeah.	13	A. I think later on, yes.
14		14	Q. And when you say "later on", it would have been
15	RECROSS-EXAMINATION	15	soon after the finding that the complaint was unfounded,
16	BY MR. LANZILLO:	16	wasn't it? Didn't that come up in the next time you
17		17	encountered Miss Conley; the DPW had found her complaint to
18	Q. You testified in response to Attorney McNair's	18	be unfounded?
19	questions that you witnessed [P.W.] grab your child and	19	A. I'm not sure.
20	treat her roughly. Is that correct?	20	Q. But you did talk about it at some point with
21	A. Yes.	21	Ms. Conley?
22	Q. All right. And I want to make sure I understand	22	A. At some point, yeah.
23	the timing of that. Approximately when did that occur?	23	Q. And what did Ms. Conley say about that?
24	A. I think not even two or three weeks after [M.] was	24	A. I don't remember. I remember what Lisa Kopycinski
25	born, which was July 6th.	25	said, but I don't remember what Abby said.
-			D 40F
١.,	Page 103	١,	Page 105
1	Q. Okay. So sometime in July of 2004 is your best	1 2	Q. Ms. Conley was upset about that finding, wasn't
2	Q. Okay. So sometime in July of 2004 is your best recollection.	2	Q. Ms. Conley was upset about that finding, wasn't she?
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2 3 4	<ul><li>Q. Okay. So sometime in July of 2004 is your best recollection.</li><li>A. Yes.</li><li>Q. Did you record that anywhere? Did you write</li></ul>	2 3 4	Q. Ms. Conley was upset about that finding, wasn't she?  A. Yeah. I think I told her about how Lisa told me how it came to be unfounded, and I think I told Abby how it
2 3 4 5	<ul><li>Q. Okay. So sometime in July of 2004 is your best recollection.</li><li>A. Yes.</li><li>Q. Did you record that anywhere? Did you write anything down to memorialize that?</li></ul>	2 3 4 5	Q. Ms. Conley was upset about that finding, wasn't she?  A. Yeah. I think I told her about how Lisa told me how it came to be unfounded, and I think I told Abby how it came to be unfounded.
2 3 4 5 6	<ul> <li>Q. Okay. So sometime in July of 2004 is your best recollection.</li> <li>A. Yes.</li> <li>Q. Did you record that anywhere? Did you write anything down to memorialize that?</li> <li>A. I don't believe so.</li> </ul>	2 3 4 5 6	Q. Ms. Conley was upset about that finding, wasn't she?  A. Yeah. I think I told her about how Lisa told me how it came to be unfounded, and I think I told Abby how it
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Okay. So sometime in July of 2004 is your best recollection.  A. Yes. Q. Did you record that anywhere? Did you write anything down to memorialize that?  A. I don't believe so. Q. All right. Let me ask you about something else here, and then I think we'll be done. Perhaps some others will have a couple more questions. You recall, do you not, that DPW investigated the complaint that was made concerning Ms. [W.] allegedly grabbing [D.] by the face?  A. Yes. Q. All right. You're aware of that? A. Yes. Q. All right. Were you aware of the DPW's finding regarding that complaint?  A. That it was unfound. Q. Unfounded? A. Yes. Q. And how did you first learn that it was unfounded? A. I got it back in a letter. Q. Okay. And did you discuss that with Abby Conley after you received the letter? A. I'm not sure. The only one I remember discussing	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Ms. Conley was upset about that finding, wasn't she?  A. Yeah. I think I told her about how Lisa told me how it came to be unfounded, and I think I told Abby how it came to be unfounded.  Q. Did Abby tell you that the DPW investigator, when she interviewed her at the conclusion of the proceeding, told Abby that the complaint would be had been determined to be unfounded?  A. No.  Q. She didn't tell you that?  A. No. My only impression was they investigated my daughter. They investigated or they interrogated [D.].  Q. Did Abby tell you that well, who told you that they interrogated your daughter?  A. Lisa Kopycinski.  Q. Do you know if Lisa was there?  A. I don't know. I don't think so.  Q. So what is your understanding as to how Lisa came to believe that your daughter was interrogated by the DPW investigator? Is that from Abby?  A. I have no idea who it was from.  Q. Did Lisa indicate that she ever talked to anyone else other than Abby regarding the investigation of Abby's

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1	A. I don't remember who Lisa said she talked to.	1	because I want to make sure I understand this.
2	Q. Did Abby tell you that they spoke with her?	2	
3	A. Hum-um.	3	FURTHER REDIRECT EXAMINATION
4	Q. Did Abby tell you anything about what the	4	BY MR. JOYAL:
5	investigator concluded as far as her credibility and her	5	
6	believability?	6	Q. Did Lisa Kopycinski ever tell you that she had
7	MR. McNAIR: Objection.	7	spoken to DPW or been interviewed by DPW concerning Abby
8	A. No.	8	Conley's complaint?
9	Q. She didn't tell you anything about that?	9	A. No.
10	A. I don't not that I remember.	10	Q. And you don't have a recollection as to how Lisa
11	Q. But I think it was Lisa Kopycinski who first told	11	told you that she even knew about the finding and the
12	you that the DPW investigator had found Ms. Conley's	12	complaint; is that right?
13	complaint about [P.W.] to be unfounded.	13	MR. McNAIR: Asked and answered.
14	A. No. The first thing I got was a letter that said	14	A. Oh, Lisa Kopycinski?
15	it was unfounded.	15	Q. Yeah.
16	Q. Okay. But other than that letter, you think that	16	A. I'm sorry. I thought you meant Lisa Babo.
17	the first person to talk to you verbally about this was	17	Q. Lisa Kopycinski.
18	Miss Kopycinski, as opposed to Miss Conley. Is that what	18	A. What was the first question?
19	you're telling me?	19	Q. Did Lisa Kopycinski ever tell you that she had
20	A. I think so, but I'm not positive.	20	been interviewed by DPW concerning the complaint?
21	Q. Okay.	21	A. No.
22	A. Probably, because I talked to Lisa almost every	22	Q. And as you sit here today, is it your testimony
23	day.	23	that you don't have a recollection as to Lisa telling you
24	Q. And Lisa did not identify how she would have come	24	even how she knew about the complaint?
25	to know the results of that confidential information.	25	A. No.
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1	A. No. Not that I recall.	1	Q. Or the finding.
2	MR. LANZILLO: That's all I have.	2	A. No.
3	MR. McNAIR: I just have a couple.	3	MR. JOYAL: I have nothing else.
4		4	MS. SCARPITTI: She'll waive signature
5	RECROSS-EXAMINATION	5	
6	BY MR. McNAIR:	6	(Deposition concluded at 12:17 p.m.)
7		1	(Deposition conduded at 12.17 p.m.)
		7	(Deposition concluded at 12.17 p.m.)
8	Q. This incident that Lisa Babo witnessed, was your	8	(Deposition concluded at 12.17 p.m.)
8 9	Q. This incident that Lisa Babo witnessed, was your daughter injured?	1	(Deposition concluded at 12.17 p.m.)
		8	(Deposition concluded at 12.17 p.m.)
9 10	daughter injured?	8 9	(Deposition concluded at 12.17 p.m.)
9	daughter injured?  A. No. Not not to where she would have to go to	8 9 10	(Deposition concluded at 12.17 p.m.)
9 10 11	daughter injured?  A. No. Not not to where she would have to go to the hospital.	8 9 10 11	(peposition concluded at 12.17 p.m.)
9 10 11 12	daughter injured?  A. No. Not not to where she would have to go to the hospital.  MR. LANZILLO: Objection to foundation. I'm	8 9 10 11 12	(Deposition concluded at 12.17 p.m.)
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6-3-04

Rab

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> DEPOSITION EXHIBIT

VW #1

Deposition Exhibit

CYLL 4

Debi LaGamba, RPR

Wordz R Us

I told leste the you dry debi was almost 10 years old & Ju any danger Harfilly she beloves me, that was her man roome. Oh - hereo Betho Ochadule Sun- 6/40 ZAN-80M Mon 4/7: 11am-5pm Tue 4/8/1/4m-5pm The 6/10: 5pm-1630pm, 46+5 1+ & goes with the following mindey, or if I make it that for I'll give you the new scholare them 1 Ohould prabably call my mon she called me like a week ago to acked me to cell her liver who cents' I have the Saby Decense 5h womes about me: The said ohe would our some money from her cheek Dieavon old probably him to take a cab to St Uncent. Ch- Leslie, Jand too that to sh Hords, But She doesn't think it's from hims as long as I stoped out of truste t did everything eight, toly long. Do Aleso good In wally suproud Chio delet get sint he feil tedig. He asso the oxy one or of

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the 10 that andat. Even he got a 12 mont serverce but to ocoperated until he lipes pis jub. Do you know already In fail & got a 12 morth Sentence

from payment of Depport.

The came in green & had affor.

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be soon, but to so had being pregnent,
to want to be able to than, own. elother. Due in anxero Lou What CKY dero about her. DOPS ... 120 Someron & tom to go to work, the med wan coming. Jorry Theres no real and to this letter Ill Leth to you trought come you 1 Maker

he but I was last gammer, I was part the that before much before we met I don't wont to get back . It it - I become an alcoholic pretty early. poreeds drik. III have to much time on my herdo ... Its nice to be able to work alor but I'm getting board wil Citting up in this bitch all day sweet giay, but offing home alones alet worse. Ito boing and depressing. Thus nothing to do him alone. I have to plus all of the prefues of you of the kids dioress me. In dury good morey wise but white the point? I don't spend any but on bollo, I an building a nice bank account but It got is storting to seen like pointless numbers. If I keep up at this rate, In hoping to have 10-15 go by the alot of money, but to not enough for any thing Ographent. Ho not nearly Energy to Day a house . Cill Ill nelly whits the point of having the rest?

Hopefully I can find a feb of our three making so much as I do have but working loss. If these the con of 1

## Can you amed of?

can keep borking money t help from
you, maybe I can bour a house in

8 in 10 years. I can look into
land contracts but nothing one seems

the go right for me

the prosest about very, I dent have
what he de, very or leave to some

to talk to dany or leave to some

the talk to dany. I dent know

why I wrote all of this ship

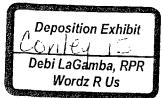
because It probably be after

our. Uisit just you get this.

hey. In in a but mud, don't know why. On old friend of min was a driver driver of kelled a le month old baby, Deni. He ou homes today, then waked 2-2. Taken was payday. I paid my ment of an exchange boil of quiano boday. I get some mosaye, se I geneso I'll talk to you in the line. Love you



V.W. #2



Rub

6.5.04

Hey. Dana. I won I would have told you to call me in the am one of these days but landed the know .. The recon Deane called me is I worn me that they're gonne detain makenzu, and there trying to por her a footer home rather then with Your man. She askally suggested ! Leave town and have the body, but of 1 mos a Usit W my keds, Paty will use that as abandonement, 00 / wouldn't ever know where it go, I how to time it. I want to falk wil ling bod & ask her if sho confident enough to get her returned to me, or of I should leave found what my Consequences would be In not OUDDONNED to know that, Deanne told me, so Can't Day who feld me. I hald your mon & she said yout stay here & continue my fight, but I wally don't want my day in fole care. Deane and to that newborns one harden to get beck because the footer porcers after Sight to keep them. Will, Deanne Coald that they're doing me wrong t that the backs to be at my next leaving I testify for me. The said shill be in Erin in Gely & Ausant, and arguey

The car help me she will. I wish you we out here, I woulded even have to go through any of this shift Swear I can't take much more of this olut - Theyor gone make me facking crazy. We been having some pretty . crazy thoughts too, willend oneo. gonne meli me lose my mud. " Western Degran", to the top of the Our chesa, I the name of the guy to Complain to, a Ill try to call her sponday. There's fast De much ohet pow. The to such a long otry I dent ever fel like going stronge it all. Oh year - Denne gave me has ashess in Charlotte. The wanted to see all of my court popers, a this I went to know & copied sweighting, then feel-exted them for her house. And get them Monday ou dis it, & see what she soys. 32e said she world to read everything I the me who shought they were going to do on trying to do.

1 wich I could have a finching drink.

I don't have want to get back into

1t, but I know there while given hopsen of I have no kedo. The see

Can you and of?

den keep benking money to help from

you, maybe I can bous a house in

I an 10 years ... I can look into

land contracts but nothing we seems

the ge right for me

the possess about over, I dent have
what it do, orig or leave to him

morely rearry at of since I must

to talk to any. I dent know

why I write all of the ship

because I'll probably be after

our visit the you get this.

know why. An old friend of mine
was a drivet driver it kelled a le
more old beby, Deni. Heo in
the paper. I went to four mans
taday, the waked 2-2. Tada
was paydey. I paid my next it can
incomment, it got an explan bill for
Autians boday. I gar solar mosaye,
so I gueso III talk to you in the
An. Love you

In the 1 was look games, I was have the shall before. My had were yest taken about a much before we mit I don't want to get back . , to it - I become an alcoholic pretty costy. I done know why ... neither of my poreiso drik. III have to much time on my beids. Ho nice to be able to work alor but I'm gathing board al Orthog up in this bitch all day every glay, but othering home alones also worke. Ito bong and depressing. Thus nothing to do him alone. I have to plus all of the premes of you I the kids dispress me. In during good money wise but where the point? I don't spend any but on billo, I am building a nice book account but It got is striting to seen like pointless numbers. If I keep up of this rate, In hoping I have 10-15 go by the the I leave . That may seen the dot of money, but to not enough in any 2 hig Ographicant. The note hearty Lough to Buy a house . all Ill' melly need is obout 2go for an aportment. White the point of having the rest?
Hopefully I can find a fets ofen there making is much as I do here but working loss. If the the con & 1

1800

6-14

Debi LaGamba, RPR Wordz R Us

The to hear from you to right! In god I get aler of sleep on Zong of the her my dad shottened my dream spectucing? He could the solary for a parallegal 10 26,000, 1 year. I don't think this enough for me to be kepty with. This would 1/2 like I make now, and I feel the I don't make enough now. Well my good also always to make past in a week, and that this his been my best wick in grano and In 9 non pregnant of I get I more emptimer, Ill get it Utter 1 tild her all the updates.

I gave Das this petrolile

Wed- 3rd, The 15th 3rd, In 15th 3rd, Jak- any, Sun 1,5t. She said the gree it to opin mon to. Centrue workey So howo ( who I grass that acred to the other ling on my gray dues a very dull order Training ... and not you, my when fry chad. Deposition Exhibit



V.W. #3

in otill proced about Pathy agreemy Distins fice This own ohit que coll Childre Derviso about but you can't when it is children sources. 10 fueled up. The & eng. crew may be ship her car this ourmer. In going to kell this who she did to Ill fell him how a both to a proof they I came up all a good roles your know what I'd love to do? Stead Pattyo. Case and (aboy) from her & have her be my suggestion If I had all I king I could pay he about 500/ak, Also probably more than she notes, & maybe more then Retty nakes. and to love for he to make more that they Sho will good out keeds the, my tools The her & oh hes working for cey. Whe ob yes thank? Ho yest a thought the day of the day. Ady the symbol orid on " Show you am the? It can the som the tell of the form 1 W 4 D With

6.22

Rob.

You lacked nice traight, you where so sweet too. They bether not shed my fuckery phone of after 1 Just ped 350 on it this weeks at least In caused car sou, the alot of others of my book. pills on little miceles, I can believe a little pill could be so effective 11 was seed as hell truding until this morning for her a shift for hely of the deck of work for thanks mus plus. In only of lds for the week I goess with to bad, I ofil got I days left, But I doubt Ill and up over 800. The good thing to that I pad all of my billo for June. I goot soid good electic toly. I have soo in bills · due the 152 week of July, and can know one bebyo coming own, or Il have to budget a little. In going to try & find tim towards. To go the back & felk to some. The They bethe give me my fishing interest that I'm would add up nicely. Ly. I can get sudiced as atheteun can I, by not being on payrell?

NOMBORED :

V. W. #4

Deposition Exhibit
Conley 17
Debi LaGamba, RPR
Wordz R Us

Oct - make that 785 for the week... In mit flekey at source. Constit the bother for more? You rever se the a period at for self edien, its under the fine - sorry - that was dearls. Hey ometime when In sleeping, I wake up red gued whom of breath, or my hear will pound like once, really hard to 111 years on my class to motally wake up who of the for I wonthing, do for? A Joney ong Job stresses for out have desperouse fable. I think , to the way my ponents raised me of
the probably too lake to change. The
10 alo: the first three ever lue
lied above to pad 100% of rue of
bills to for being I man project, and you, my live, have cooked me an auf of the groney since were been together, so he siping that pay it back while faire looked Up. I'm bether, cuz in phill made

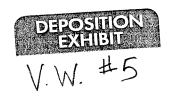
I write my lawyer a letter to,
Ill drop it off Amoron. I
rully the assig, one nice. Din
said she was hopy; own Mitty gras Dustri, too so she work the only witness. I told her In licky I didn't on the, shot or Id be incorcacted of aboaut . In nelly glad - Cobby filed a complaint. Offer theo is all over with, In going to get something nice for assig, Deance & Lise. I'll have to there Outstocker appropriete, like geft. Certification on ornething. Something nice though, like \$100 volume each, at last thy all deserve it. I can't want for my next hearing. I hope it will go ned well and Dem abby & love be there for textiming. OK sweeter - 100 4 m - true to go hand, In gome ochally go to Grant Eagle & get lanch for the Keds tomorrow. In Landing Diss renter patient to week picture. Send then Book ok? a. Ill and the 9 month one too. Ill falk to for forman. 1 & glow.

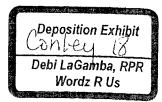
Ros

7-15

Oppo - Dong your pretures will be a day late... I was going to said them - out the morning but - + was - trued ... slipt well 10:15. Ill send you a money ades on Sun- the know we bein sitting up in here alot, my checks of one 50, \$ 1 Ohll got 4/2 hours left. I should be motherzees pretures. He Said she beautyl. He said she looks like fac, I can't want to go to court, In revous that I want go well, but Im alor arracus, & Ill have also going for me. litty said I have "a nice sized any". The whel so ifedualy To was here yesterday, Knoty told her. when I was having the baby, I given . she Ald Kest Williams to tell you ongeteletoro on your beby girl.

1 sent letus out toolay to Dr State I my atty. I don't think they will get away w/ terminetry my sights, I Im for hisvores about it, but they Ouldn't aven get aggnavated oucom otances





on Ohims. I can want to fell to Ed Pelesella lither. mon aid probably have to feke hu. In glad these people are wally peoply he, they coverely don't have for do 14 but they are, abby, Donne & Lisa, especial, assy, when posting her for on the line. Ofer at the 10 our 11 of them. Even Low from clo, when ar had she grows meeting & Pety was being so resilive, she looked shocked at the way she was astrong, and after some you hed me sign a relieve of infinding In my lauger, I thick my lauger warts to supporce her too. I hope Petty & Son go down for all of this bellock to Fall with me, 11 Lake a "mobiling leave" Central the kods come home - weeker. They rail get me for any support while in a year of I want, aspecially while

In brestfuling. III proofer of a while year of I havelo. how can I warress on anythy the flat of ,

Gette pump lovery 3 hours. I know
they re possed to that I get my
supposed adjusted from Deo to 350,

non its stopped. I ready how the Judge Sup that thees something wany Such this presure. In so glad that I wo able to him a lawfer, or Id I feeled. May called me today, pice Sold that the fielge so gay to get fined of Al of these defined people coming & feetiffing against Dey. I hope mullerzee comes home on the 12th 1d like to have her while ohis still a lotter pearity ye know? Buto boby is to weeks old & ghe is a big already. They grow so love que

lien

DELOSITION EXFIBIT

V. W. #4

JUL 1 2 2004

Debi LaGamba, RPR Wordz R Us

Deposition Exhibit

Ms. Deveney,

Office of Children & Youth ERIE, PENNSYLVANIA

9 July 04

Tom writing this letter to you with some questions that I have regarding my daughter, Markenije, and her being detained

Victi was injured by you that she would be allowed to see our daughter on a daily basis. However, Patti has reduced those visits to mondays, wearesdays, and Fridays, why was she able to do that it you, her supervisor, stated Victi is allowed to see Makkennie daily?

I would like you to hence that I wall be unable to have Markenije visit me here at the joil until the Commonwealth isours her birth certificate. The ignil's policy in that they made proof that she is my child, as they would fish any person who is confined here. In the meantime, I intend to write letters, dian pritures, send cards, and send photos to Nis. Wagnitak to give to Markenije. I have also ingrammed Patting my intention to do this in a letter dated.

July 9, 2004.

Ms. Devenuy, I am very upset with how my decoupter's detention was how dead. Patti informed Vicki that she would call Vicki when our daughter was with my cousin. However, Patti did not call Vicki until the bollowing day. For over 12 hours we had absolutely no himsuladase a where makkenge was Patti did not

have the common countery to call Vicki and let her homour that our daughter was sage and where she was supposed to be. I hope this is not a reflection of the protectionalisms of OCY as a whole.

I have obtained legal coursel and all correspondence that I send to Pathi and to you will be copied and sent to my attorney as well as copied for my own records. Amy correspondence sent to me by you, Patti, or OCY will likewise be copied and filed accordingly. -townizaou itto Feat Lamony prioces acou I ingsted you grabbing, shocking, and yelling at Destine. Though your agency stated these allegations could not be proven, given her personal history and other incidents I have been made amone of, I trust you and your agency will do all that you can be insure that Patti is not a threat to Walkernie in anyway. I would like another person to be present with Pathi at anytime that she is alone with my daughter. I will pensue all legal avenues against her, you, and OCY is warkengie is harmed in anyway while in Patti's come, or is I suspect she was been harmed in anyway. Course what happened to her child. I am very confirmed as to how she is allowed to hold the position that she has more.

Ms. Deveney, I was also informed that MakKennie was seen by a visiting muse. I have
informed Patti by letter and voicemail
that I want to be notified each and every
time that Makkennie is seen by a doctor or
receives any medical attention I also want to
homow the nature of each visit and what, if
anything is done to Makkennie at each visit.

At this time, I would like to make you for
mading my letter. Thank you.

Sincerely,

Robert on Beer

Ras

5-21

I hope your fuling a little better tholog. I wish our conversation expertended would be. been a little better but whe when but in low spiness, but we had rights to be In a little worked too. my lewyer and not be be dioceanized but 10 laster and then dine. Oh suned fairly conficient so hope the can help me. There is a goo point to geing to bring up to her No one really had much negetice to pay about my ability to care for Destini. If I could get Destini returned to my cooked - my ded may take Gulian and Mallenze I'll cook my atty about that Chather point 10 that in the court ownwaries, Pattyo in the only one who said all negetice things. Obsyp was kind of neutral, and Lisa from ( DL btro) & Suio (the writing nurse) were protive. De Von Konfor was more negetie then prosture, but he ouggested I got reed some therapy and closes, not that I was hopeleon like Pattipo impression gave. I went though all of the court esummanes and highlighted everything that Was a he or their I disagreed with. Here, In going to write you some of the exact abods from these court outer. Sunnoves ...

> Deposition Exhibit COVICY Debi LaGamba, RPR Wordz R Us

De Verkatto berding assistant "Concerno in this cope Centered upon Victorios obility to fully understand how her actions have affected her children". I wand drawing to "dominate the stork of the session" - he generally considers it an Ill-chasen achorty the reflects on attempt to orthically bridge the gop in content with the children - Julian was allowed to room Debut the plagram nore or less unattended - Vicana was affertule to Julian in the sense Het ohe watered after two offly. apparent imprope in blickers relationship with Golian. The chichers removed aggrowered the : Dituetion (my bind with Golin) - (1) present as an emotionelly flat, merpenerced and pearly attured mother of two - Or the point in time, the relationship Culti Galian) 18 in some difficulty. (1) had scare involvement with Galan print his placement - The ostuetion 10 quite about better for Destrois exho had a buffer what with mother and who is currently in the midst of her Unbal explosion. This is an ideal child partner for or enotionella stillo, physicala aloof, and hypn-verbel nother. Destrois exuberance of only civily high and suff-Dustaining At poe ar obstacle for her.

- The examiner is not clear whether (1) would be able to outsfy do musicas requirements. (1) certainly believe that (1) could - The interpretation of Faither to their lands (m) to angue the (my) children - like (me) one ouply on the small and of the seals. " in fact, Victoria- who is Small and, even in her second frimeder, guile them - claimed to be even onelles then Dosting during her The doctor repriedly did not say engthing negative about (my) feed deary (for Destin) - Despite a reported harry of houng been decend, thereford and abused?) (1) maintained more than the minimal degree of - Involvement with m- Bashim - (1) denied ony residual hostility toward Chris. (1) was prepared to see his behavior as a function of his immating at the time. (1) severed unconcerned about - (Dr Von Korff) proposed that (1) might have then a more otact line with respect to his certails with the dilater. - (mg) subolquest intimete relationships Show med gravitaring toward londuck disordered and emotionally troubled young nes. - MMPI-2 indicates networthy chrackerological

problemo, test pesulto Dusgestia

depot a person who is an uninhibited and verbally facter individual who is willful and returns to admit enon; an industreal who sends to be preceived by other as infriendly, aloof, or uninvolved, - Resulto suggesting organificant problems with ankety and physical symptons were denied. (mg) interest in the lest reallo was topid at best. (my) menner renained opaque. (His) affection in most drawn to 2. Seemingly Interrelated Deto of findings. The finds 10 a feedering found proncured Suff-confidence and Single mindedness. The second is semisimed Construction. For (me), purpose and drue appear to the obere within a porticularly insulated system, are in which envisioned experience 10 nerrow and attenuated. Lack of enound investment lends itself to as exaggrand sense of self-assures exabling relative calm though timo of crisis. Enderance of this type is affect by a lack of empothy and a failure to apprecious enutrone meance. It to very had to reach or influence this type of Individual, - (1) prounted so an emotionally remote young women who accom added to the dements of the evaluation . (my) manner, though obliging, was stronged mechanical. In the Kindust of tems, (1) much be described as

- (mg) relationship with Galeer will probably improve when he orived at Desting's age and his own period of interse until actionly It would be well to work with Creed in the meanable for improve the foundation of the relationship.

(1) appear to be to be hoppy then (1) see my children, (1) often some, hey and know Destry & Julian when they arrive or deput from visito.

- (1) broght both children on Easter gift & condy at the april wisit; (1) here does brought anasher for the children to let dury visito.

There have been numerous timo that Jilian will wank off and get into therepo where (1) an oblivious of his location in predicement

During the visit that occured on 5/12, those was a Dignificant of fluence in (mg) conduct and ponenting performance. (1) and appropriate followed both children's cues thoughout the entire dissolution of the orsit (1) also intervened several times in regards to the Defety of (mg) children, i.e. ooking children to pit in the chair us steeling in the chair. The conversion of appropriate parenting in this visit compared to the form granusted orside was notable

- 100 U red some improvement on (mg) - (!) should be encouraged to decide for five every between the 2 children during visits.

- 10 (!) am without enction and say very little to children or this aide dury visito Jue Carloino NeasT assessment ( Usity nuse) - as pu this assessment () an able to read and respond to John's peeds without difficulty. - there are no onces that (1) an grossly deficient in. - my scores were not more than I student deviation from the mean Dr Von Kaff's Psychological Eval. - It was noted that (mg) is fest the appended
"unstable" at the fine of referred. Mr. Boshor
had been meanward, and I especial to
have no clear means for maintaining housing

- (1) am a perste yours women who promised as a emetionly flat and detached names. (i) had a sterile quality that gove the Immediate impression of either an uncommenty annote or cake aloting individual.... (my) tone wis decopor and strangely casual - (my) long range goals appeared lossely concerned and possibly unrealistic. They Include attending a particular law ochons In Ft myers

- (assy) need to stervere to osome his sifely - (1) he so foreoight to potential risk factors and lack porental insight and pointing Okello and the ability to interest at their levels Even with point ers and Duggeotions (1) seem inable to pount both of these children at the some from. - On the may 5m wist (1) kupt ook & "whos birthday is tomorrow?" to Destini. (1) brought Do grafe, no cake, or bitholy cord for her. - (1) did bry Jello copo, breekfost bors, & arrhedo for the oreal. The UISIL WO from 1030 1248. No lunch was provided - these visites do not sur motrelly benficial for all modered. - (1) an to aftered the Womens Come Center poresty course, (1) have not begun this so of this date, nor twe! completed It. - (1) kept of why that (Dwo Leaving La Florida, to go to ocher, at reaving (my) children have. (1) then stated that (1) was staying here. (1) The chall between steging and leaving. I have an unrealister you of the Situation that covard (mg) Children to be placed and fake no responsibility for this placement.

- Records the referred (Form "y Tred) was med as (1) agreed to bled in Ene & west to see if they are returned to (me) or sint he (mg) forher, prin to relocating to Florida (1) expert to obet school to Flored in the Fall, but (1) Leve not yet applied to the school - The (Paty) has attempted to closely marker this case due to (mg) promerey and (four) Involvement in book toobery; howent D an very closed and georded with (Pathy) this worker.

- (D & J) would not be sake if when it to (me) a (Chris). (Chirs) hont been soul with the test him, of. (1) an new affuned to (mg) childrens needs and oupervision.

- (my) bond with Gelin 10 poon. (1) tend to 15 note him and his actions -(1) ou not sum able to one for whose children

consistently.

-(1) minimize the criminal involvement of (mg) medio both (Chris) and (for were involved in robbines - (1) repeatedly otale (1) on loving for Florida with or without my children (1) have differents enging and what is h

(mg) childun; Gilia more so then Destin.

- (1) had be bean her to point and to inserest with my distrem prior to coming for ony children

ematter - of - fact, no nonsense, on tothe -point. However, ouch descriptors fall to address the self-limiting nature of her emetroral rigidity. - (mg) renoterios reflects significant character oligical problems the greatly affact (mg) relation ships. (1) have defliculty engaging and relating to her (my) children, Julian more than Destroy. (1) lack atturement to the abolding development capacities and honstations, so (my) ability to play and nexture to compromised. - the present testing suggests that these Imuch no one closely related to (my) proceeding deforculties. In addition to being emotioned of franceted, (1) have a hadened, emperterable quality. (1) an deforcest to influence. (1) var minimization, rationalization and denul so major defensive maneumer ?. (1) have a had have recugaring problems that one fairly evident to others. (my) the was shockingly desirous when (1) described such losues as mr Bookins Theotening, violent and criminal Schooling. - Offered recommendations to (m) 10 problematic (1) an a willing ad determined prent who neverthe Goo fado to recognize on mayor problemo Interior point-child fraisid ongery individual theropy to admiss (mg)

problemo with attachment. (1) am apt to be inwading recrotate and outwarding compliant with referred of this nature. It 10 the Fook of the professionels receiving these refunds to his (m) find tooks at hend. (My) motivation to regain Custedy is othery, and offers a strating point. - Individual theropy need not be completed prior to & return of the children. The duction of ouch work is had to predict, al Should be considered as ongoing effort - In Chis) opinion, the carrect attitude is one for the dysteral patterns of powerly. Pattin Court Junnary - a finding of aggresoled cremoteres is not made with regard to (me) The Beero nother his centerful the agency requestry permson to come for her new granddaughter, once born, in the event their this against plane to detain him. - (Rer) observations of the visitations are that Gilino reeds go unner by his mother. - Oplin is totally unsupervised by his

modker

I haven't get a copy of the court summary yet from Project find over, but Lisa told me is was very prostice. Sine of the Ohit ohe put in my court summary. I will our any on monday, I hope she hos erough time to go oder everything. I probably made over 50 rited with a highlighter I per Pathy got clot of newe to talk about my Duperusson. Where wo her puperussion when her 10 year old hing himself? Fredery bitch I done ever know if 1 ca ever fale to her on a colo Count anymore. 16 530 Am Sat. morning. I cal bus in proved in world for 250:6 que all dy & he lift me 2 mosages, so did my ment many. may se get one kied returned to me as a olat whit do you think? I'll Well In study high Land on Ill always. get this are. I law for & h-pefelly III fell to fee mades note.